

EXHIBIT 10

EXHIBIT 10

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

v.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048-SVW (JC)

DECLARATION OF DR. ROB HARPER

I, Rob Harper, declare as follows:

1. I am over the age of 18 years, have personal knowledge of the facts contained in this declaration, and can competently testify to them.

2. I understand that this Declaration may be used by Plaintiff Vernon Unsworth in support of his defamation case in the above matter.

3. I am a British citizen and resident. I am a veterinary surgeon by occupation and for about 50 years my primary recreation has been caving both in the UK and around the world. It was in this context that I first met Vernon Unsworth in 2014 when he invited me and Martin Ellis to join him on an exploration of the Tham Luang cave system.

4. Since that visit in 2014 I have been back to Thailand on multiple occasions for the purpose of exploring and surveying the far reaches of Tham Luang with Vernon and looking at other caves in the area.

5. Vernon joined the cave rescue in June 2018 without hesitation and it was through his recommendation that I became involved. I am a cave diver but I didn't actually dive in the rescue, I provided in-depth knowledge of the cave system and its layout to the divers and other members of the rescue operation. People would approach Vernon and I with ideas as to how to get the boys out, and we would provide an opinion as to whether the idea would work, or

highlight any problems that we foresaw. I also spent time with Vernon looking for shafts or passages on the surface of the mountain in the hope there may be another way down into the caves.

6. I interacted with the dive rescue team on a daily basis. We shared the same accommodation and each day Vernon would bring us all breakfast and we would discuss the rescue. Whenever the divers weren't in the caves we would discuss any problems they were facing. Vernon, the divers and I were together as one group and would spend at least a couple of hours together each day. I never saw or heard of anyone refusing to interact with Vernon nor was he ever asked to leave the site.

7. Vernon was up every morning before us and would often be the last of us to leave in the evening. During the rescue, he worked tirelessly around the clock to assist in whatever way he could, giving 100% despite the substantial cost to his physical and emotional welfare. He ran himself absolutely ragged and got more and more haggard in appearance every day.

8. Knowing Vernon as I do, I never expected anything else and I am convinced that without his efforts the chances of a successful outcome would have been very low indeed. I would describe Vernon as a lynchpin of the operation. He spent a lot of time talking to the Thai authorities and it was Vernon who suggested that they contact me, Rick Stanton and John Volanthen. Once we were there he facilitated the progress of the dive teams; if we needed something Vernon would help make sure it happened. Due to our knowledge of the cave system, Vernon and I were also able to advise on the viability or otherwise of various proposed strategies, to ensure that time and effort were not wasted.

9. Regarding Elon Musk's allegations that Vernon is the kind of 'sexual tourist' who would engage in child rape, marrying a child bride or any other forms of paedophilia, I have

never seen any behavior nor heard Vernon express any sentiments that could possibly be interpreted in that light. Vernon has never mentioned visiting Thailand before 2011 and I have never heard anyone else contradict that.

10. The man I know is a generous person with immense personal integrity. He is utterly dependable. I have trusted him with my life and would do so again. Unequivocally, I am proud to say that Vernon Unsworth is my friend.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in WELLS, SOMERSET, UK on 26/09, 2019.

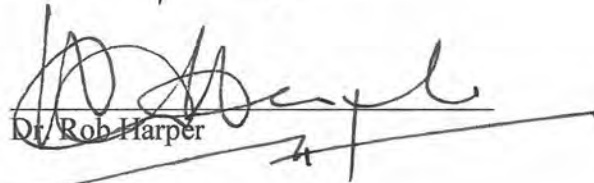

Dr. Rob Harper

EXHIBIT 11

EXHIBIT 11

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

v.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048-SVW (JC)

**DECLARATION OF MR. MARTIN
ELLIS**

I, Martin Ellis, declare as follows:

1. I am over the age of 18 years, have personal knowledge of the facts contained in this declaration, and can competently testify to them.
2. I understand that this Declaration may be used by Plaintiff Vernon Unsworth in support of his defamation case in the above matter.
3. I am a British citizen and resident who, as a pastime, has been caving and researching the caves of Thailand since 2000. I maintain a website on Thai caves (<https://www.thailandcaves.shepton.org.uk/>) and have authored several papers and guidebooks on the caves of the country. I have extensive knowledge about, and information on, the caves of Thailand.
4. I first came into contact with Vernon Unsworth in June 2012. Mr Unsworth got in touch with me via the contact form on the Thailand caves website, when he returned to the UK after 7 weeks in Chiang Rai. He had spent a lot of his time on this trip exploring Tham Luang Nang Non and was after more information on the cave. This was the start of an extensive and continuous correspondence on Tham Luang Nang Non and the nearby cave of Tham Sai Thong.
5. I first met Mr Unsworth in person in March 2014 when Robert Harper

and I visited him and his partner Woranan 'Tik' Rattawipakhun between 6 and 13 March, staying at the home of Ms Woranan's parents near Huai Krai, Chiang Rai. On this visit we surveyed and explored in Tham Luang, Tham Sai Thong and a few other caves in Chiang Rai. The next time I visited Mr Unsworth was in July 2016 when my wife and I visited Huai Krai, staying in a nearby hotel, from 4 to 7 July. Due to the time of year the weather was too wet to do much more than visit some of the smaller caves.

6. Mr Unsworth has been exploring Tham Luang Nang Non at every opportunity since that visit in 2012. He has extended the length of the cave by over 4 km and has very nearly connected Tham Luang Nang Non to the nearby Tham Sai Thong. It would be fair to say that no one has a better knowledge or understanding of the cave system in Doi Nang Non mountain, including its speleology and hydrology. He is well known locally, with the Forest Park staff and villagers, for the amount of time he has spent in the cave, so it came as no surprise to learn that Mr Unsworth was called in the early hours of the morning of the 24 June 2018 when the first rescue party came out of Tham Luang when they found the cave flooded.

7. Later in the morning of the 24 June my wife saw Ms Woranan's Facebook post which mentioned that Mr Unsworth was involved in the rescue. From then onwards I followed the rescue operation closely and provided remote assistance by sending cave maps to Mr Unsworth and others involved in the rescue. For example, I was in email contact with the deputy director and director of the Thai Department of Mineral Resources helping them to understand the cave system.

8. After the British Cave Rescue Council got involved in the rescue on

the 26 June they asked me to write a briefing document for their council members. I continued to give the British Cave Rescue Council background information on the progress of the rescue. I was then sent to the site as part of the British Cave Rescue Council rescue team on the 6 July to support the British divers, and I stayed there until the 11 July.

9. In my opinion, if it wasn't for Mr Unsworth's presence at Tham Luang from the start of the rescue all thirteen of the trapped party would now be dead. Mr Unsworth spent all 17 days either in Tham Luang or searching the mountain above the cave. It was Mr Unsworth who on 26 June very forcibly insisted that the Thai authorities request the assistance of the British cave divers, supplying them with the names and phone numbers of the divers. Mr Unsworth knew that the dive operation needed that expert assistance, and I don't know of anyone else that close to the centre of the rescue who could have insisted on the recruitment of outside cave divers.

10. When the cave divers arrived at Tham Luang it was Mr Unsworth's detailed knowledge of the cave that aided the divers in their search. During the actual rescues on 8, 9 and 10 July 2018 Mr Unsworth was in Chamber 2 of Tham Luang assisting with the transfer of the stretchers on the 'ziplines' section.

11. At no stage was Mr Unsworth requested to keep away from the cave, and he was consulted throughout the rescue operation by the Thai rescue leadership, the British cave dive team, and the other foreign rescue teams. Nor did I observe or learn that the dive team refused to hang out or associate with Mr Unsworth, either during the rescue or afterwards.

12. Mr Unsworth's essential and pivotal role in the Tham Luang rescue is recognised at the highest level by the Thai authorities. We have both been

awarded the Most Admirable Order of Direkgunabhorn (Second Class) in recognition of our work at the rescue and have both been invited to be advisors to the Thai National Committee for Cave Management Policy.

13. Concerning the allegations that have made against Mr Unsworth following the rescue, at no time during the past 7 years of e-mails, phone conversations or my two visits to Huai Krai have I seen him exhibit any behaviour even remotely akin to that of which he has been accused by Elon Musk. I have never known him to have engaged in any sexual activity with a minor, to have married a minor, to have arranged to marry a minor, or to have expressed any interest in sexual activity with a minor; nor had I heard of anyone accuse him of such conduct other than Mr Musk. To the best of my knowledge, Mr Unsworth had not visited Thailand before 2011, and he first visited after he met Ms Woranan when they were both living in the UK.

14. I am still in regular communication with Mr Unsworth, and I have visited him in Chiang Rai in March and July 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Shepton Mallet, Somerset on 20 September, 2019.



Mr. Martin Ellis

EXHIBIT 12

EXHIBIT 12

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

v.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048-SVW (JC)

**DECLARATION OF MR. RICHARD
WILLIAM STANTON MBE GM**

I, Richard William Stanton MBE GM, declare as follows:

1. I am over the age of 18 years, have personal knowledge of the facts contained in this declaration, and can competently testify to them.
2. I understand that this Declaration may be used by Plaintiff Vernon Unsworth in support of his defamation case in the above matter.
3. I am a British citizen and resident. I have over 40 years' experience as a cave diver, a hobby I took up when I was 18 years old. I have been involved in a number of high-profile cave rescues over the years, including in 2004 when I helped to rescue 6 British military personnel from a cave in Mexico which was quite a big international and diplomatic event at the time.
4. In June and July 2018 I participated in the rescue of 12 boys and their soccer coach from the Tham Luang cave system, an event now known as the Thai Cave Rescue. My initial role was as a 'pathfinder', laying a dive line through the water to find a route forwards. It was while we were laying this dive line that John Volanthen and I found the children. John and I were then put in charge of planning the dive rescue, and once that rescue plan got the go-ahead we were in charge of the dive portion of the extrication itself. John and I, together with two other British divers, physically brought the children out. The four of us would each carry a child

through the water in a form of improvised harness and stay with them all the way out of the cave, then the next day we would go back and get another. For my role in the Thai Cave Rescue I was awarded the George Medal, the United Kingdom's second highest award for acts of civilian gallantry, in the New Year's Honours List 2019.

5. I became involved in these events at the recommendation of Vernon Unsworth. I know that it was Vernon who insisted that the Thai authorities contact me, John Volanthen and Rob Harper. I had not met or spoken to Vernon before, but he knew of me due to my prior work on cave rescues. Without him being on site calling us in I feel confident in saying there would have not have been a successful outcome. Cave diving is incredibly dangerous especially in flood conditions and the operation needed divers who were experienced working in conditions with zero visibility. Without Vernon's intervention, the boys could all have died in those caves.

6. On Tuesday 26 June I was asked to help by Rob Harper, who was in contact with Vernon and the Thai Ministry for Tourism and Sport, and we were all flown out to Thailand that same day. We first arrived at the cave site on Wednesday evening at around 8pm and Vernon was the only one there to greet us. He had been on site for between 3 to 4 days already and he had acquired a room for us to use as a base and as storage for our equipment.

7. Vernon was my point of call for cave knowledge throughout the rescue. He knew the layout of the cave system as well as how the flooding process worked, and he could predict what was going to happen depending on the rainfall. At one point on the evening of Wednesday 27 June the water started backing up into a chamber of the cave that we called Chamber 3 and Vernon correctly predicted that the hundreds of Thai military personnel located in the entrance Chamber had 4 hours to evacuate before it became inundated with water, when it had previously been dry. He was also able to correctly predict where the boys would be found within the cave

system.

8. Vernon worked tirelessly throughout the entire operation. He was vital to its planning and helped with the physical extraction as well. The boys were loaded onto ziplines to help traverse certain dry areas of the cave and Vernon helped with this process.

9. I have seen comments from Elon Musk that Vernon was shunned by the divers and that we refused to spend time with him. That is simply not true. The divers were in constant close contact with Vernon throughout the rescue. Rob, John and I all shared the same accommodation and each morning Vernon and his partner Woranan Ratrawiphukkun (known as 'Tik') would bring us breakfast, Vernon would accompany us into the cave up to the dive point and assist with our equipment, and Tik would bring us food throughout the day. If we weren't underwater then we were almost constantly in Vernon's company if he was available and not assisting with the search for alternative routes down into the caves from the mountainside. He was always welcome with us and I never saw or heard anyone say a bad word about him.

10. I have also seen the other accusations that Elon Musk has made about Vernon's character, that he is a 'sexpat' or paedophile who took a child bride. I have not seen anything in Vernon that would suggest those accusations are true. The caving community is also a very small world and I have never heard anyone say anything of this nature about Vernon. If someone had the slightest inkling from the past that Vernon was guilty of that type of behaviour, it would have been said by now.

11. Regarding Elon Musk's involvement in the rescue, a lot of different ideas were put forward as to how to get the boys out. We tried not to dismiss any idea unless we were confident that it wouldn't work. For instance, at one point there was a concept discussed involving a PVC or tarpaulin tunnel approximately 1 metre in diameter which would be laid flat,

over-pressurized, which could have led to the seals rupturing and the death of the occupant.

There was also no way to monitor the status of the occupant whilst they were underwater.

15. From the images and videos that were shown to me it seemed completely untenable to put someone in it and keep them alive. There was no question of could we or should we use it in the rescue, it simply wasn't ready at all and wasn't fit for purpose. I was urging Mr Musk to continue making it because I was expecting his prolific team of rocket engineers to come up with solutions to those problems because we didn't have the time or resources for further development.

16. To this day, I have not seen Mr Musk's tube in person. Mr Musk told me it was in transit on 9 July and I presume he and the tube arrived in Chiang Rai in the early hours of 10 July, by which point we had already rescued 8 of the boys. Everyone knew where we were based, and nobody came and presented it to us or asked our opinions on it. I am told that engineers from the SpaceX team were onsite until after the rescue finished and I would say that if they felt the tube could have genuinely added something to the operation, then they would have shown it to us.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in COVENTRY U.K. on 30th SEPTEMBER 2019.



Richard William Stanton MBE GM

EXHIBIT 13

EXHIBIT 13

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

v.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048-SVW (JC)

**DECLARATION OF MR. BEN SVASTI-
THOMSON**

I, Ben Svasti-Thomson, declare as follows:

1. I am over the age of 18 years, have personal knowledge of the facts contained in this declaration, and can competently testify to them.

2. I understand that this Declaration may be used by Plaintiff Vernon Unsworth in support of his defamation case in the above matter.

3. I am a British citizen and since 1978 I have been resident in Thailand where I work as Executive Director of The Foundation of Child Understanding (FOCUS), also known as the Anti-Trafficking Coordination Unit Northern Thailand or TRAFCORD. We are the longest established non-governmental agency in Northern Thailand working to combat child abuse and human trafficking, having been established in 2002. In 2009 we were praised by the U.S. State Department as one on the most highly commended initiatives combating human trafficking worldwide. I am also an Honorary Consul for the British Embassy Chiang Mai. For the avoidance of doubt, I am making this Declaration in my personal capacity and not on behalf of the British Embassy.

4. I first encountered Vernon Unsworth in 2018 during the events now known as the Thai Cave Rescue. The British Embassy Bangkok asked me to act as

liaison for the British cave rescue team at Tham Luang Cave; I was onsite from 25 June to 10 July 2018. During this time I got to know Vernon well and developed a tremendous professional respect for him. If I was to name one person who was crucial to the mission and successful rescue of the children, it would be Vernon Unsworth. Indeed, I can remember talking to Weerasak Kowsurat, Minister of Tourism and Sports, in the months after the rescue and based on our conversation I am certain he would share this assessment of Vernon's contribution. In the first days of the mission, it was Vernon who made it clear to the Thai authorities that the only chance of saving the children was to immediately request the services of specialist cave rescue personnel from the British Cave Rescue Council (BCRC). Minister Weerasak followed Vernon's advice and in 24 hours British cave divers were operational in the cave. Without the expertise of the British cave rescue team, including Vernon, the rescue mission would have failed.

5. Throughout the mission, Vernon's firsthand knowledge of the cave and caving expertise was invaluable to the rescue effort. Every day of the rescue mission, Vernon was one of the first to enter the cave and one of the last to leave. Elon Musk's assertions that Vernon was asked to leave the cave rescue mission are simply not true.

6. I have also seen that Elon Musk has accused Vernon of being a pedophile or child rapist with a long history of visiting areas of Thailand known for sexual tourism, and that Vernon moved to Chiangrai to marry a child bride who was 12 years old at the time. In my capacity as Executive Director of FOCUS/TRAFCORD I can state that we work closely with a multidisciplinary team of several agencies including the Thai police, and in particular a top Thai police agency named Thai Internet

Crimes Against Children (TICAC). We have been responsible for the arrest of many child abusers as well as Western pedophiles. Neither my agency nor any of our partner agencies has ever received any information to substantiate the serious accusations made by Elon Musk against Vernon Unsworth. We conclude that they are totally unfounded and grossly detrimental to his character.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in CHIANG MAI THAILAND on 4TH OCTOBER, 2019.

A handwritten signature in black ink, appearing to read 'Ben Svasti-Thomson', written over a horizontal line.

Mr. Ben Svasti-Thomson

EXHIBIT 14

EXHIBIT 14

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**Elon Musk** @elonmusk · 24m

Never saw this British expat guy who lives in Thailand (sus) at any point when we were in the caves. Only people in sight were the Thai navy/army guys, who were great. Thai navy seals escorted us in — total opposite of wanting us to leave.

**Elon Musk**

@elonmusk

Follow

Replying to @elonmusk @zeynep

Water level was actually very low & still (not flowing) — you could literally have swum to Cave 5 with no gear, which is obv how the kids got in. If not true, then I challenge this dude to show final rescue video. Huge credit to pump & generator team. Unsung heroes here.

7:04 AM · 15 Jul 2018

10 Retweets 134 Likes



20

10

134

20

**Elon Musk** @elonmusk · 10m

Replying to @elonmusk @zeynep

You know what, don't bother showing the video. We will make one of the mini-sub/pod going all the way to Cave 5 no problemo. Sorry pedo guy, you really did ask for it.

34

10

83

34

EXHIBIT 38
ELON MUSK
08-22-19

Exhibit 14

Page 432

EXHIBIT 15

EXHIBIT 15



Kevin Beaumont  @GossiTheDog · 51m

Oh, sorry, he's calling the guy who found the children a pedo. Real classy, @elonmusk.



Elon Musk 

@elonmusk

Replying to @zeynep

Never saw this British expat guy who lives in Thailand (sus) at any point when we were in the caves. Only people in



8



52



319



Elon Musk 

@elonmusk

Following

Replying to @GossiTheDog

Bet ya a signed dollar it's true

11:11 AM - 15 Jul 2018

44 Retweets 255 Likes



EXHIBIT 16

EXHIBIT 16

From: [REDACTED]
To: [Sam Teller](#)
Subject: Re: Draft outline - UPDATED
Date: Tuesday, July 17, 2018 8:31:43 AM

After sleeping on this, I'm not happy about the suggested approach. It would have been particularly foolish and craven of my to do it last night, right after a share drop, as my apology would simply have been dismissed as a disingenuous and cowardly attempt to restore the stock price.

We need to stop panicking.

On Jul 17, 2018, at 7:20 AM, Sam Teller <steller@spacex.com> wrote:

Have solicited feedback on these points (not the exact words) from Gwynne, Shallman, Saltsman, Todd, Sarah, Deepak, Antonio, Anthony Romero, Davis, Elissa and Omead — all very positive and agree that this, combined with a break from Twitter, sets you back on the right path internally and externally. You of course need to put it in your own words. Just need an honest acknowledgment of the recent past combined with a genuine apology and inspiring look to the future. Everyone will love and respect you for more for openly admitting the mistake and showing how much you care about your employees and the company missions.

##

I understand that my recent behavior has probably embarrassed you and I'm sorry.

I apologize to Vernon Unsworth and am reaching out to him to personally convey this, as well as my deep appreciation for his work in saving the kids.

Regarding the Thai rescue, it made me extremely upset to read the attacks on our integrity and motives when I knew how hard 30+ of you across the companies worked as volunteers for four days straight, canceling vacations, sacrificing time with families, wearing the same clothes for days on end, just to try to do something helpful for those boys.

To be on the receiving end of personal attacks is of course hurtful and, as you know, things at Tesla in particular have been stressful, but it doesn't excuse lashing out in the way I did.

The work you're doing every day here is so impressive and inspiring, and to have the news focus on trivial Twitter spats instead of your accomplishments is ridiculous. So you'll be happy to know I'm taking a break from the Twitter hellswamp. I understand that the attacks won't stop - that's just life from here on out - but I'll do my best to tune them out.

My focus has been on the companies and pursuing our missions for the last 15 years and it remains so today.


Thank you for everything you're doing to change the world. I'm so proud to work with all of you and promise to become a better and better leader moving forward.

Elon

EXHIBIT 17

EXHIBIT 17



Elon Musk 
@elonmusk

Follow



Replying to @adamchavez

As this well-written article suggests, my words were spoken in anger after Mr. Unsworth said several untruths & suggested I engage in a sexual act with the mini-sub, which had been built as an act of kindness & according to specifications from the dive team leader.

11:38 PM - 17 Jul 2018

1,976 Retweets 22,248 Likes



1.6K



2.0K



22K



EXHIBIT 39
ELON MUSK
08-22-19

Francis Y. Schuler, CSR No. 11343
FBI/DOJ



Elon Musk

@elonmusk

Follow



Replying to @elonmusk @adamchavez

Nonetheless, his actions against me do not justify my actions against him, and for that I apologize to Mr. Unsworth and to the companies I represent as leader. The fault is mine and mine alone.

11:41 PM - 17 Jul 2018

1,054 Retweets 8,753 Likes



1.1K 1.1K 8.8K

EXHIBIT 18

EXHIBIT 18

10/4/2019

Elon Musk on Twitter: "You don't think it's strange he hasn't sued me? He was offered free legal services. And you call yourself @yoda ...

**drew olanoff** ✓ @yoda · 28 Aug 2018

one other thing, elon. your dedication to facts and truth would have been wonderful if applied to that time when you called someone a pedo.

26

17

730

**Elon Musk** ✓

@elonmusk

Follow

Replying to @yoda @RMac18 @TijenOnaran

You don't think it's strange he hasn't sued me? He was offered free legal services. And you call yourself @yoda ...

9:41 AM - 28 Aug 2018

176 Retweets 1,659 Likes



716

176

1.7K

**drew olanoff** ✓ @yoda · 28 Aug 2018

Replying to @elonmusk @RMac18 @TijenOnaran

i think a lot of things are strange, elon. what i think is especially strange here is that you're wondering why he hasn't sued you while the rest of us are wondering why you did something so egregious that he could sue you for in the first place.

35

34

1.6K

**Elon Musk** ✓ @elonmusk · 28 Aug 2018

Did you investigate at all? I'm guessing answer is no. Why?

126

41

959

**drew olanoff** ✓ @yoda · 28 Aug 2018

yes, elon. the world should police your lack of filter and everything that comes after. that's extremely convenient. and hey. sue you, he still might. or anyone else that you've whack-a-moled without thinking twice about.

29

19

1.1K

**Elon Musk** ✓ @elonmusk · 28 Aug 2018

Answer the question @yoda. You brought it up, not me. Did you investigate or not? If so, what did you actually do?

160

44

1.1K

**drew olanoff** ✓ @yoda · 28 Aug 2018

EXHIBIT 19

EXHIBIT 19

From: [REDACTED]
To: [Ryan Mac](#)
Subject: Re: BuzzFeed News: Unsworth legal letter
Date: Tuesday, September 04, 2018 5:31:45 PM

Get lost, you creep

On Sep 4, 2018, at 5:30 PM, Ryan Mac <ryan.mac@buzzfeed.com> wrote:

Hey Elon,

I'm sure you've seen the story at this point. Still happy to talk with you on whatever terms you want as long as we set them beforehand. Let me know if you want to do a phone call.

Best,
R

On Tue, Sep 4, 2018 at 1:18 PM, Elon Musk [REDACTED] wrote:
Off the record

I suggest you ask Unsworth to describe his whole ~30 year history of visiting Thailand. What was he doing in Pattaya Beach for the better part of a decade when there are no caves of note in the area?

On Sep 4, 2018, at 12:22 PM, Ryan Mac <ryan.mac@buzzfeed.com> wrote:

Hi Elon,

While I'd rather chat on the record, I'm happy to go off record with you moving forward so you can answer specific questions regarding the allegations you've made.

Thanks,
Ryan

On Tue, Sep 4, 2018 at 10:53 AM, Elon Musk [REDACTED] wrote:

Off the record

We haven't had a conversation at all. I sent you an off the record email, which very clearly and unambiguously said "off the

record". If you want to publish off the record comments and destroy your journalistic credibility, that's up to you.

As for answering more questions, I would be happy to do so, but not with someone who just told me that they will not honor accepted rules of journalism.

On Sep 4, 2018, at 8:49 AM, Ryan Mac
<ryan.mac@buzzfeed.com> wrote:

Hi Elon,

I didn't agree for the conversation to be off the record, but appreciate the response. To follow up, I've tried to report out some of these accusations on my own but have not found anything to corroborate the claims. Are you able to share anything that you've found about Vernon Unsworth? Do you have any evidence or documentation showing he took a 12-year-old child bride, that he is a child rapist, or that he was kicked off the rescue site, as you stated in your other email? Also are you able to share your correspondence with Rick Stanton showing your discussion of the submarine specs?

With regards to your statement about the legal threat not coming up until you raised the issue on Twitter, the legal letter was dated on Aug. 6 and sent to your Los Angeles home and to one of your SpaceX emails. Did you not see the letter prior to your tweets?

Thank you,
Ryan

On Thu, Aug 30, 2018 at 6:43 PM, Elon Musk
[REDACTED] wrote:

Off the record

I suggest that you call people you know in Thailand, find out what's actually going on and stop defending child rapists, you fucking asshole. He's an old, single white guy from England who's been traveling to or living in Thailand for 30 to 40 years, mostly Pattaya Beach, until moving to Chiang Rai for a child bride who was about 12 years old at the time. There's only one reason people go to Pattaya Beach. It isn't where you'd go

for caves, but it is where you'd go for something else. Chiang Rai is renowned for child sex-trafficking.

He may claim to know how to cave dive, but he wasn't on the cave dive rescue team and most of the actual dive team refused to hang out with him. I wonder why ...

<https://www.google.com/search?q=chiang+rai+child+trafficking&ie=UTF-8&oe=UTF-8&hl=en-us&client=safari>

As for this alleged threat of a lawsuit, which magically appeared when I raised the issue (nothing was sent or raised beforehand), I fucking hope he sues me.

On Aug 30, 2018, at 6:07 PM, Ryan Mac
<ryan.mac@buzzfeed.com> wrote:

Hey Elon, just wanted to make sure I did my due diligence to research basic facts and follow up here.

Thanks,



Ryan Mac | **BuzzFeed News** | Senior
Technology Reporter Cell: (949) 315-9364
| Office: (415) 477-1620 |
@rmac18 | [121 2nd Street, 3rd Floor,](#)
[San Francisco, CA 94105](#) |
<https://www.buzzfeed.com/ryanmac>

On Wed, Aug 29, 2018 at 9:06 AM,
Ryan Mac

<ryan.mac@buzzfeed.com> wrote:

Hey Elon, thanks for getting back. Actually he prefers to be called a "spelunker" and we've confirmed that he actually does do cave diving. But do you have any comment on the letter your received?



Ryan Mac | **BuzzFeed News** | Senior
Technology Reporter Cell: (949) 315-
9364 | Office: (415) 477-1620 |
[@rmac18](#) | [121 2nd Street, 3rd Floor,
San Francisco, CA 94105](#) |
<https://www.buzzfeed.com/ryanmac>

On Wed, Aug 29, 2018 at 8:38 AM,
Elon Musk [REDACTED]
wrote:

Have you actually done any
research at all? For example, you
incorrectly state that he is a diver,
which shows that you know
essentially nothing and have not
even bothered to research basic
facts.

On Aug 29, 2018, at 7:40 AM,
Ryan Mac
<ryan.mac@buzzfeed.com>
wrote:

Hi Elon,

Ryan from BuzzFeed
News here. We're
reporting a story out
about you receiving a
letter from a lawyer
representing British
diver Vernon
Unsworth. The letter,
dated August 6, was
sent to your Los
Angeles home and
discusses potential
legal proceedings
against you for libel.

Given the Twitter
conversation
yesterday, I was
hoping you could talk

about the letter and
whether you had seen
it yet. I'm happy to
chat on the phone if
you want to call me at
[REDACTED]

Best,



Ryan Mac | **BuzzFeed**
News | Senior

Technology Reporter

Cell: (949) 315-9364 |

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ac

EXHIBIT 20

EXHIBIT 20

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Describe all harm You have suffered, if any, as a result of the “False and Defamatory Accusations” You identify in Your Complaint, including but not limited to any harm to Your property, business, trade, profession, or occupation, any expenses You have had to pay as a result of the statements, any harm to Your reputation, or any shame, emotional distress, mortification, or hurt feelings You have experienced.

RESPONSE TO INTERROGATORY NO. 1:

Plaintiff objects to this interrogatory to the extent that it prematurely seeks the disclosure of expert testimony.

Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

Damages to Plaintiff’s reputation are presumed by law and Plaintiff’s Complaint in this matter speaks for itself. Moreover, Plaintiff has suffered actual reputational, emotional, and mental harm, and has suffered from stress, emotional distress, anxiety, and feelings of social isolation. Plaintiff is not seeking damages for lost wages or earning opportunities or any other special financial damages.

Defendant’s accusations have hit Plaintiff very hard emotionally. Plaintiff is concerned in regular everyday interactions and in general that the stigma of being called a “pedo” and “child rapist,” among other things, by one of the world’s most famous billionaires will follow him for the rest of his life. Even when there is a positive news story, such as a story regarding the award of the MBE to Plaintiff, it seems to Plaintiff that Defendant’s false accusations are effectively the headline and an integral part of the story. His interactions with people have been negatively impacted by Defendant’s false accusations. Plaintiff is forced to consciously consider whether any individual believes he is a pedophile, a child rapist, and/or that he married a 12-year-old child bride, which causes Plaintiff anxiety, stress, emotional distress, and feelings of social isolation. Plaintiff presumes that had Defendant been called a pedophile and child rapist on multiple occasions publicly to millions of people by a billionaire that Defendant too would be mortified, shamed, angry, stressed, and anxious, because accusations of pedophilia are so heinous. Plaintiff is

1 particularly distressed because this is not any run of the mill accusation of criminal conduct, but
2 instead refers to one of the most detested forms of misconduct in the world.

3 Plaintiff was not known to the general public prior to the cave rescue and was, instead, a
4 private person. To the extent he was known to the general public prior to Defendant's false
5 accusations, it would have been in his capacity of trying to help save those trapped in the cave.
6 After Defendant's false accusations, however, Plaintiff feels his reputation is as a pedophile or child
7 rapist or, at the least, the guy Defendant called a pedophile and child rapist. Even the cloud of
8 suspicion is very emotionally distressing. Plaintiff feels that Defendant created for him an
9 incredibly wide reaching public persona as a pedophile and child rapist.

10 As a practical demonstration of the harm to Plaintiff's reputation and the emotional distress
11 and anxiety that he has suffered, Plaintiff was investigated by the Thai authorities, including the
12 Maesai District Police, Maesai Immigration Police, and Huai Khrai Police, as a result of
13 Defendant's false accusations, and they interviewed the family of Plaintiff's significant others and
14 other important people in the local village where Plaintiff stays in Thailand. This investigation
15 communicated to members of Plaintiff's community that Defendant's accusations were legitimate
16 enough to trigger an official response.

17 Plaintiff has also suffered stress, emotional distress, and anxiety because of the pain
18 Defendant's accusations have caused to Plaintiff's family, including Tik (Plaintiff's partner of 8
19 years), his wife Vanessa (although separated), his daughter Danielle, his mom Vera, his sister
20 Shirley, and niece Sian, all of whom have experienced emotional distress and anxiety due to
21 Defendant accusing Plaintiff of engaging in abhorrent, criminal sexual behavior with children.

22 **INTERROGATORY NO. 2:**

23 Describe any psychiatric injury or disorder You have suffered as a result of the "False and
24 Defamatory Accusations" You identify in Your Complaint, including but not limited to (a) the
25 characteristics and symptoms of the injury/disorder, (b) when such injury/disorder began and
26 ended, (c) the name of any doctors or other medical professionals that have examined You for the
27 injury/disorder, (d) the dates of such examination, (e) diagnoses, and (f) prescriptions or other
28 treatment you have received as a result.

1 Plaintiff was subject to a bankruptcy proceeding in October 1999 initiated by a UK company
 2 called Standard Life in regards to a commercial loan following the split of Burgess Wreford &
 3 Unsworth, and discharged in 2002. Plaintiff recalls the sum in dispute being 36,000 Pounds
 4 Sterling. Plaintiff understands that the remaining assets/renewal commissions of Burgess Wreford
 5 & Unsworth were used in the bankruptcy to pay debts of the partnership. No other proceedings to
 6 Plaintiff's knowledge.

7 **INTERROGATORY NO. 13:**

8 Describe all Travel You have taken to outside of the United Kingdom, including but not
 9 limited to the dates of travel, cities visited, the names and addresses of accommodations where You
 10 stayed, the identities of any Persons who accompanied You, and the purpose of the Travel.

11 **RESPONSE TO INTERROGATORY NO. 13:**

12 Plaintiff objects to this interrogatory on the basis that it is overly broad, unduly burdensome,
 13 not reasonably calculated to lead to the discovery of admissible evidence, and submitted for the
 14 purposes of harassment. It is not limited in any manner by time or subject matter, and it is irrelevant
 15 to this case if Plaintiff traveled, for instance, anywhere in the world for a private law-abiding
 16 purpose when he was a child. Although Plaintiff believes it is overly broad, Plaintiff will respond
 17 dating back to the year 2000.

18 Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

19 From 2000 to the end of 2007, all travel were family holidays with Plaintiff's wife and
 20 daughter. Plaintiff does not recall specific dates, but typically travelled during Easter and half term
 21 breaks. International travel included to continental Europe, primarily Portugal (the family's
 22 favorite destination) and Spain. The family also visited Plaintiff's brother in Donegal, Ireland on
 23 two occasions. Plaintiff has also been on golfing trips with members of the Verulam Golf Club and
 24 the Rusty Nail Golf Society, including Portugal, Spain, Ireland, and France.

25 Plaintiff did not travel abroad from 2008 to 2010, due to the UK recession.

26 Plaintiff first visited Thailand in July 2011, and has visited many times since, which is
 27 recorded in his passport. Plaintiff often stays in Thailand for several months at a time, including to
 28 be with his significant other and explore caves. On two occasions, Plaintiff has flown to Vientiane,

1 Laos due to rules requiring after 90 days that you travel out of country to extend your in-country
 2 stay by another 60 days (April 2017 and April 2018). Plaintiff's significant other accompanied him
 3 on the first of the two occasions traveling to Laos.

4 **INTERROGATORY NO. 14:**

5 Identify all social media or blogging site, platform, or application, including but not limited
 6 to Twitter, Facebook, Instagram, Snapchat, YouTube, Pinterest, Myspace, LinkedIn, or
 7 classmates.com, on which you created, maintained, wrote, received, or read any profile, posting,
 8 message, status update, wall comment, "Like," or other document or communication; (b) the date
 9 you initially accessed, opened, or created the social media or blogging site, platform, or application;
 10 (c) all of Your associated screen names, aliases, or accounts; and (d) whether each account is still
 11 active.

12 **RESPONSE TO INTERROGATORY NO. 14:**

13 Plaintiff objects to this interrogatory on the basis that it is overly broad and not reasonably
 14 calculated to lead to the discovery of admissible evidence.

15 Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

16 Plaintiff does not personally use Twitter or Facebook. Plaintiff does have a Facebook page
 17 created and controlled by his significant other, Tik. Plaintiff does not know the password for
 18 accessing the Facebook account. If anything arrives via Facebook, Tik will show Plaintiff and
 19 Plaintiff will advise of any response or no reply at all. Plaintiff does have an Instagram account
 20 with at present 34 posts, 19 followers, and 11 followed. Plaintiff's Instagram account is under
 21 "vernonthunsworth". Plaintiff has not created or otherwise used any social media profile.

22
 23 Dated: July 17, 2019

L. LIN WOOD, P.C.

24 By: /s/L. Lin Wood
 25 L. Lin Wood

26 Attorneys for Plaintiff
 27 VERNON UNSWORTH
 28

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

v.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048-SVW (JC)

**PLAINTIFF VERNON UNSWORTH'S
VREIFICATION OF RESPONSES
ELON MUSK'S FIRST SET OF
INTERROGATORIES**

I declare under penalty of perjury under the laws of the United States of America that the foregoing responses to Elon Musk's First Set of Interrogatories to Vernon Unsworth are true and correct to the best of my knowledge.

Executed on July 16, 2019.



Vernon Unsworth

EXHIBIT 21

EXHIBIT 21

From: Jared Birchall
Sent: Tue 7/09/2019 7:06 PM (GMT-07:00)
To:
Cc:
Bcc:
Subject: Fwd: Rowena Update
Attachments: image00200001.jpg; PHOTO-2018-08-23-18-38-4800002.jpg; PHOTO-2018-08-23-18-38-4800003.jpg

----- Forwarded message -----

From: **Jupiter Private** <info@jupiter-private.com>
Date: Fri, Aug 24, 2018 at 11:46 PM
Subject: Rowena Update
To: James Brickhouse <jbrickhouse11@gmail.com>

Jim, all understood. Is there a specific date & time we are working towards? Is there a possibility of extending that window?

With a small window to gather evidence and not hearsay I may have to change the approach and look to run a media interview if she is available without the target. We then might be able to extract the exact timelines.

Interestingly The Age of Consent in Thailand is **15 years old**. Thailand statutory rape law is violated when an individual has consensual sexual intercourse with a person under age 15. However, sex with a minor under age 18 is a compoundable offence, regardless of consent.

We will all put in an extra shift on this for over the weekend regardless of the success fee. Jim my attitude is to build a long term relationship in support of you & your team.

James

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On 25 Aug 2018, at 01:45, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Sounds good. Also, for successful confirmation of nefarious behavior there is an additional \$10k bonus. Timing is important as you know. Preferably in the next 36-48 hours.

On Fri, Aug 24, 2018 at 1:53 PM Jupiter Private <info@jupiter-private.com> wrote:

Jim, I will enquire and confirm. We are working a number of different enquiries & I will have more information over the weekend.

I'm contactable at any time.

Rgds,
James

CEO - Qatar & UAE
Jupiter Military & Tactical Systems
893, Doha Expy, Doha, Qatar

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On 24 Aug 2018, at 19:26, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Thanks for this. Do we have more info about the timeline when he originally went to Thailand? Was his current wife the girl he finally settled on after a period of 'exploring' the world of underage Thai girls? Can we get a firm confirmation that they met while she was a minor?

On Fri, Aug 24, 2018 at 9:06 AM Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

The name of his wife in Thai is 'น.ส.วรรณ รัตนวิฑิตกุล'

The English translation is a vibration of:

Woranun Radravipakkun
 Woranun Radravipakkun
 Voranan Radravipakkun
 Voranan Rudravipakkun

The Target and Woranun have been married for 7 years, 28yrs gap between them both.

She is the Deputy Chief Executive of the SAO - Subdistrict Administration Organisation in Huai Khrai, Chiangrai Province





Kind regards,
James

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<PastedGraphic-1.tiff>

<image002.jpg>

<PHOTO-2018-08-23-18-38-48.jpg>

<PHOTO-2018-08-23-18-38-48.jpg>







EXHIBIT 22

EXHIBIT 22

From: James Brickhouse
 Sent: Thu 9/06/2018 12:45 AM (GMT-07:00)
 To:
 Cc:
 Bcc:
 Subject: Fwd: Project Rowena Udate
 Attachments: image00200001.jpg

----- Forwarded message -----

From: **Jupiter Military & Tactical Systems** <info@jupiter-private.com>
 Date: **Mon, Aug 27, 2018 at 9:47 AM**
 Subject: Project Rowena Udate
 To: Jim Brickhouse <jbrickhouse11@gmail.com>

Jim,

Further information will be forthcoming as the team continues with the tasking:

GREEN what we know as fact.

ORANGE what we are in the process of verifying

RED - hearsay or unproven and not based on any facts

- When did he move to Thailand? 2011? **The target moved permanently to Thailand in the 2010. Prior to this the target had been spend periods of upto six months at a time living and travelling in different parts of the country.**
- How long prior to that had he been visiting? Does he have a history of visits? **The target has been traveling on and off to Thailand for cave exploration since the late 1980's.**
- Why that town/village? **This village (Huai Khrai) is where the targets wife (extended family) is from and where she grew up . She is now the VP Executive of the SAO - Subdistrict Administration Organisation in Huai Khrai,Chiangrai Province**
- When did he divorce his wife in the UK? **This information is not yet available to me.**
- Did his resignation from Quaternion House LTD coincide with his move to Thailand? Or had he moved prior to that? **Mr Unsworth moved permanently to reside in Thailand in 2009. His Quarternion career as a mortgage broker was on a part time basis. He had moved to Thailand before his resignation and would have resigned at the end of the Tax year in March 2011 to benefit from the tax benefits.**
- Is he independently wealthy? Does he make money from his coffee shop? **The target is not independently wealthy. He has not pension savings scheme and only has one property in the UK which is mortgage free. This property is rented out for approximately £800-£850 PCM. The asset (The Old House 5 Normandy Road, St Albans, Hertfordshire, AL3 5QG) is valued at £850,000 GBP but has a low rental income. The target does not have large amounts of disposable income.**
- Do you have more details regarding his coffee shop/hobby? **The target does not own a coffee shop but does have a keen interest in local Thai Coffee producer and often makes visit to these plantations to purchase coffee beans to roast himself. We regard this as a hobby.**
- Have you spoken to his main competitor to see what information they may have? **??? No - we don't regard the target as having a main competitor**

- What are his living conditions in Thailand? His living conditions are basic compared to the developed world but would be considered an above standard in this part of Northern Thailand. He has running clean water, sanitation, wifi and satellite TV.
- When did he marry his wife in Thailand? 2011? We are in the process of verifying this information.
- When did he meet his wife in Thailand? Target met his wife in 2008 in her role as Vice President of the local commune. She is a colloquial English speaker. She was introduced to the target by a mutual English friend. After the initial introduction the target approached his now wife to enquire to her for permission to map & explore local cave networks.
- How did he meet her? See above
- What was her age when they met? The target is 63 years old. His wife we believe is 30 which would have put her at 18/19 when they first met. The target would have been 52 yrs old at the time. This is NOT verified yet but will be ASAP. His behaviour is at best described as a "Mantner" - UK slang for opposite of Cougar.
- Was she the 10th teenage girl he met before he decided to settle? We are collecting evidence from local X Pats who have known the target for the past decade to establish targets 'hunting patterns'

Kind regards,
James

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On 27 Aug 2018, at 00:38, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Hi James - Clearly we'd like the information now. There is some urgency to this situation. We believe there are planned attacks in the media and/or a lawsuit that are imminent. With that said, we aren't looking to frame anyone. If there is definitively no smoking gun, then let's get the information necessary to make that determination and it is what it is. But if there is something more, we need information asap. Some of the specific questions that would be good to answer are:

- When did he move to Thailand? 2011?
- How long prior to that had he been visiting? Does he have a history of visits?
- Why that town/village?
- When did he divorce his wife in the UK?
- Did his resignation from Quaternion House LTD coincide with his move to Thailand? Or had he moved prior to that?
- Is he independently wealthy? Does he make money from his coffee shop?
- Do you have more details regarding his coffee shop/hobby?
- Have you spoken to his main competitor to see what information they may have?
- What are his living conditions in Thailand?
- When did he marry his wife in Thailand? 2011?
- When did he meet his wife in Thailand?
- How did he meet her?
- What was her age when they met?
- Was she the 10th teenage girl he met before he decided to settle?

If you are able to carefully do a 'press' interview with him or her - or both, then I say let's use any and all creative methods possible. But maybe better separate so he doesn't influence her willingness to be forthcoming. I'm told there may have been some journalists who have attempted to pull his criminal records in Thailand. I'm guessing that any such effort has only served to alert his wife and possibly motivate him to alter his behaviors for a time while the spotlight is on him.

If employing additional asset is possible, in the interest of time, we will support this - even if it mean an additional expense. Are there other assets or an additional group we should consider including in this effort? We need a definitive determination one way or another as soon as humanly possible.

On Sun, Aug 26, 2018 at 11:07 AM Jupiter Private <info@jupiter-private.com> wrote:
Jim, what are the timings for the project ?

How much time do we have ?
On the phone is you need to call.
regards,
James

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EXHIBIT 23

EXHIBIT 23

From: Jupiter Military & Tactical Systems
Sent: Thu 8/30/2018 11:04 AM (GMT-07:00)
To: "Jim Brickhouse" <jbrickhouse11@gmail.com>
Cc:
Bcc:
Subject: Rowena Report
Attachments: Project Rowena00001.pdf; image00200002.jpg

Jim,

Attached a preliminary report of where we are and follow up actions.

I will write a seperate report on the media push.



I would like to send this from an encrypted address.

CLOSE HOLD

Project ROWENA
AUGUST 30th 2018


CLOSE HOLD

CLOSE HOLD

Subjects Full Name	Vernon Harry UNSWORTH
Date of Birth	██████ 1955
Address in Thailand	<p>████████████████████ - VERIFIED</p> 
Address in United Kingdom	<p>████████████████████ VERIFIED</p> 
UK Passport No. ██████ Issued London 28/09/2010	VERIFIED
Criminal Record Search	No civil or criminal charges have been recorded within the United Kingdom or Thailand
Sex Offender Register	<p>No Sex Offenders registrations recorded within the EU</p> <p>EU Offender Search includes current and historical sex offender registration records from all EU member states this also includes List 99 and the Interpol register.</p> <p><i>Please note that the type of crimes that require registration vary by EU member state therefore not all individuals convicted of a sex crime in one EU member state may be included in another EU member state's registry.</i></p>
Credit Check – Limited information was recorded at the address listed above.	No adverse records or outstanding judgements recorded at the UK address provided above. No indication of financial stress.
Current location	Arrived back in the UK from Thailand on 29th August and is currently living with his Mother Vera Unsworth in Braintree, Essex. Approx. 55 miles from London.
Income	Mr Unsworth is renting his house out in St. Albans for £875.00 GBP per calendar month. He lives rent free in Thailand as the home he shares with his wife is owned by his mother in-law.

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CLOSE HOLD

	<p>Mr Unsworth also works part-time in his mother in laws shop.</p> 
Background	<p>Mr Unsworth was educated Verulam School which is a state secondary school for boys with an academy status in St Albans, Hertfordshire. He spent his career in unregulated financial sales, most recently as a self-employed mortgage broker which he gave up in 2009 when the UK mortgage market became fully regulated.</p> <p>He was a competitive motor cycle bike racer competing in two Ilse of Man TT's races in 1983 & 84'.</p> <p>He has been a frequent visitor to Thailand since the 1980's. Prior to meeting his current wife we believe that Mr Unsworth was living in the Pattaya Beach which is a well-known tourist destination. Pattaya Beach is synonymous with prostitution and scam artists. We are in the process of verifying this information which was mentioned to the lead investigator by Mr Unsworth mother-in-law.</p> <p>Mr Unsworth has been described to our investigation team by other UK volunteers attached to the Cave Rescue team as a 'Manther' slang for an older man with a taste for younger women.</p> <p>It's a reasonable assumption in life that if you come across a mature man in a relationship with an obviously much younger women that this in itself is out of the ordinary behaviour.</p>
Thailand	<p>Mr Unsworth spends on average ten months a year in Thailand maintaining a relatively low profile in his community. He was described to our investigators as friendly but quiet. He spends most of his day to day time working as an assistant in his mother-in-law's road side shop.</p> <p>Mr Unsworth drives a Japanese 4X4 vehicle with a value of \$1000 USD.</p> <p>Mr Unsworth moved permanently to Thailand in the 2010. Prior to this he had been spending periods of up to six months at a time living and travelling in different parts of Thailand & travelling in South East Asia.</p> <p>His living conditions are basic compared to the developed world but would be considered an above standard in this part of Northern Thailand. He has running clean water, sanitation, Wi-Fi and satellite TV.</p>

CLOSE HOLD



CLOSE HOLD

	<p>Mr Unsworth met his wife in 2008 in her role as a secretary to the Chief Executive of the local commune. She is a colloquial English speaker. Mr Unsworth wife was introduced to him by a mutual English friend.</p> <p>After the initial introduction the Mr Unsworth then approached his now wife to enquire with her in seeking permission to map & explore local cave networks.</p> <p>Mr Unsworth is 63 years old. His wife we believe is 30, (we will confirm this in the next 48hrs) which would have put her at 18/19 when they first met. The target would have been 52 yrs old at the time.</p> <p>If this is the case that Mr Unsworth choose to live in Pattaya Beach before moving to Northern Thailand, then it would be a strong indicator as to his lifestyle interests. If we can establish that Mr Unsworth was a regular visitor to this part of Thailand which is not known for its extensive cave networks then this is something that may support the assumption that he is a "Sexpat"</p> <p>The sexpat whore-mongers his way through the go-go bars of Thailand. His only other friends are his sexpat peers. Peek-density occurs in and around Pattaya – Thailand's sin city.</p> <p>Interestingly our investigators in Thailand who have shared a beer with some of the UK & Dutch divers who also volunteered stated that Mr Unsworth was not a popular man or particularly liked man in the Cave Rescue Team. When pushed as to why, they simply replied "Creepy"</p>
Next Steps	<p><u>THAILAND</u></p> <p>The Thai investigation team will follow existing lines of enquiry specifically looking at the following questions:</p> <p>Can we confirm that Mr Unsworth was a frequent visitor to Pattaya – This can be established by checking old visa applications that he would have made on entering Thailand. Mr Unsworth would have had to have a registered address, hotel or apartment. If he stayed with a friend, then who? Is that friend a known Sexpat? We are running these lines of enquires.</p> <p>We are running an interview with his wife tomorrow and will be able to ask more searching questions about the relationship and specifically looking at her age when they met and how he courted her.</p> <p>Vernon Unsworth is an unpopular loner which makes the investigation more difficult as we are always looking for friends to lead us into certain conversation topics.</p> <p><u>UK</u></p> <p>Mr Unsworth is a member of Verulam Golf Club www.verulamgolf.co.uk and he will be playing Golf there in the coming weeks. The investigation team will be looking to integrate itself with him either as part of a playing four ball or</p>

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		<p>in the clubhouse bar. This will be to establish how far along the legal route he has gone and what the strategy is. The Golf Club are planning to host an evening dinner in his honour.</p> <p>*Unless instructed, we are not running mobile and foot surveillance on Mr Unsworth during his visit in the UK.</p>
--	--	---

	Subjects Full Name	Voranun Radravipakkun (Nickname - Tik) wife on Vernon Unsworth.
	Date of Birth	To Be Verified
	Address in Thailand	<p>[REDACTED] - VERIFIED</p> 
	Current location	Currently in Chiang Rai returning to Huai Krai (home village) 31 st September.
	Income	<p>Tik is employed as a Secretary for the Chief Executive of the SAO at Huai Krai SOA, Maesai, Chiang Rai (Subdistrict Administration Organization) working address is 95 m.4 Baan Hong Hae, Huai Krai, Maesai, Chiang rai, 572200.</p> <p>Phone number; [REDACTED]</p> <p>Her personal phone number cell is [REDACTED]</p> 
	Background	Tik was born and raised in Chaing Rai and lives with Mr Unsworth in a house belonging to her mother.

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Thailand	Tik is spoken about as someone who is popular in her village and well known as she is the only good English speaker in the commune of 12 villages.
Next Steps	THAILAND The focus of the investigation with Tik is in establishing what age she was when she met with Mr Unsworth. This information should be confirmed by the Thai investigation team within the next 48hrs.



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CLOSE HOLD



CLOSE HOLD



EXHIBIT 24

EXHIBIT 24

From: James Brickhouse
 Sent: Tue 9/18/2018 4:39 PM (GMT-07:00)
 To: "Jupiter Private" <info@jupiter-private.com>
 Cc:
 Bcc:
 Subject: Re: Project Rowena Update

You mentioned several days ago that you would be sitting down with your embassy contact to get documented proof of Unsworth's travel over those 6 years that you indicated he spent time in Pattaya. Did that happen? That is an important piece of verification.

On Tue, Sep 18, 2018 at 4:16 AM Jupiter Private <info@jupiter-private.com> wrote:

Jim, this is the info as it came to me from the female lead from our team who befriended the sister and mother. Obviously we now know the DOB was incorrect. They related to the investigator that he first visited Thailand 29 yrs ago which would have been 1989. I have asked Steve to look at the Uk embassy records to verify.

1. When did he first move to Thailand?

= He first moved to Thailand about 7 years ago. (He first visited Thailand 29 years ago for his cave exploration project in the Southern of Thailand)

2. Do we know if he was visiting in the years before he moved to Thailand?

= Before he met Kun Tik. He sometimes traveled to Thailand for cave exploration and came with his cave explorers.

3. Why did he chose Chiang Rai, or was he based somewhere else previously – Pattaya etc'?

= The reasons that he has chosen to live in Chiang Rai, because he loves studying about caves. Chiang Rai has plenty of interesting caves, especially Tam Luang. He believes that he still can explore more about this cave. Secondly, Kun Tik., it is her hometown and also she has land and house here. Tik has to take care of her family i.e. her Father, Mother and daughter (with her ex-husband) and she has a job here. So that it'd be a good reason for Vernon to live for his retirement here.

4. We understand he may have a coffee shop in Chiang Rai – is this his source of income?

= He opened a small coffee shop in 2016, named "Cha-Pa-Yom" which it is located in Mae Pha Luang district. It was a small coffee stand. It was not his source income.

5. If he has the coffee shop, is it successful and what do his competitors think?

= In the past he used to open this small coffee shop, there were a whole lot customers. So he didn't have competitors.

6. Where does he live and what lifestyle does he lead – expensive house/condo?

= For some period of time, they would come to stay with Tik's parents house. Her mother's house is also a small grocery shop. It has been on business since 2011. "Wan dee" is the name of the shop, which located in Baan San-Yao 99/1 Moo. 3, Huai Krai sup-district, Maesai district, Chiang Rai Province. It's a one floor house and it is belong to her family.

7. Is he actually married to Khun Voranan?

= They have not made the marriage registration but they had a wedding ceremony according to Tik's family traditional.

8. When did they meet and how did they meet?

= They both met each other in England 8 years ago. Tik had a summer vacation and visited her friends there. A friend of her introduced Tik to Vernon. That was the beginning of their relationship.

Additional information;

1. Miss Woranan Ratrawiphukkun

- Her previous name was Suvimon Chomkeaw

- born on [REDACTED]/1988

- Age 30

- Phone number [REDACTED]

- She used a car brand MG. Light blue color, plate no. [REDACTED] Chaing Rai

- She's been working as a Secretary of Chief Executive of the SAO at Huai Krai SOA for 7 years.

- She worked in a chemical company in Bangkok.

- She quit the job in Bangkok then moved back to her hometown, in order to open the grocery shop. Her mother's now running the shop.

- She was married with a Thai person. She has a daughter/ 13-14 years old. The reason that she divorced was her ex-husband had a another lover.

- Tik has one younger sister. Her sister is married and moved to another province.

- She graduated in Bachelor degree in Chaing Mai Rajabhat University, in management major.

- She has her business, is manicures salon "Elegant nails & Beauty Spa". There are 2 branches

1st Branch is located in front of Mae Fah Luang University

Address: 489/1 Moo. 1, Super high-way Road, Tha-Sud sub-district, Mae Fah Luang district, Chiang Rai province.

2nd Branch

Address: Baan doo 421/1 Moo. 3, Nang-Le sub-district, Mae Fah Luang district, Chiang Rai province.

Open from 10.00 to 21.00 Hrs.

- Her business is running well, there are a lot of customers. Because there is not much competition. And it is her main income.

- She has open her business since 2013. The rentals cost 8,000 baht/p month

- He is fascinated in cave exploration all over the world and he has been doing it for over 40 years. He usually went with his team. He is planing about investing a tour business in Chaing Rai.

- They also have another business is importing digital Coffee Tamperers. Since 2016 Name: "Eazytamp Thai" it sells throughout the nation. They has opened this business since 2016, they're both visiting many coffee shops.
- They recently bought a piece of land, which is close to Tik's mother house about 2 km. they are planing to build a house as well as a small resort there. Now it is a rice field.
- Vernon has a cave exploration project again in Tam-Huang soon. As the same time, he will also explore a cave in Naan province with his team.
- Vernon has left Thailand on the 18th July 2018 to England, then he will return on the 5 Sep 18 at the Suvarnabhumi Airport, Bangkok. His arrival at 3pm and Tik will fly to meet him at 4pm the airport.
- They both will attend to the thanking party at 6pm-21pm the Dusit Palace, Bangkok. The party was held by the Thai Government.
- Vernon stays in Thailand by a Tourist Visa from the beginning. He sometimes extended his visa by crossing the border in Maesai district, sometime he went to Vientiane. The Thai Government will renew a type of visa for him for a long term stay.
- He will stay in Thailand about 1 or 2 months then he will return to England.
- Vernon was married to an English lady and they have one son.
- Vernon is older than Tik for 23 years, they started dating in late 2009

Kind regards,
James

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not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

On 17 Sep 2018, at 23:49, James Brickhouse <jbrickhouse11@gmail.com> wrote:

I'm available whenever you are.

Also, what was the information source that suggested Unsworth has been going to Thailand since the 80's?

On Mon, Sep 17, 2018 at 10:59 AM Jupiter Private <info@jupiter-private.com> wrote:

Jim, I'm still here in Thailand and I am have not diverted my efforts away from the task or I would have informed you. I have been working hard with my Thai team as we last discussed. The time zones don't make it easy to communicate and as I had not heard from you I had presumed you where away with the principle. Disappointed you would think me so ready to abandon my post.

I am on route back to Chiang Mai tomorrow and suggest we communicate at 1700 GMT for a de-brief.

Kind regards,
James

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On 17 Sep 2018, at 18:50, James Brickhouse <jbrickhouse11@gmail.com> wrote:

James,

It appears you have decided to focus on other efforts that don't include the Rowenta related work. Your last email was 5 days ago and it contained nothing relevant to this project. Only a reference to your efforts to getting the birth record, which I obtained on my own accord. If you have decided to focus elsewhere, that is fine, but I will expect funds to be returned.

Thank you.

On Fri, Sep 14, 2018 at 10:29 AM Jupiter Private <info@jupiter-private.com> wrote:
Jim in transit I'll call when I am free a little later.

Kind regards,
James

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On 14 Sep 2018, at 18:19, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Any news?

On Wed, Sep 12, 2018 at 7:49 AM Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

Yes I've been on the ground these past five days. I apologise for the lack of comms, my UK cell reception is not great and I have been in transit between Chiang Rai, Bangkok and Pattaya.

Unsworth was not a liked man on the ground during the dive rescue. A number of the Dive centres in Pattaya have divers that assisted with logistics in the rescue and have mentioned to me over a few beers that Unsworth was difficult and that he's attracted negative press to the rescue efforts. Everyone knows that his comments were initially inflammatory and that it was his initial outburst that riled the principle. When asked if they thought or knew anything about Unsworth's past they all said that they had no proof and had not heard anything specific. Just that he is not an easy man to like.

The update is that I am waiting this evening to meet with the Thai investigator and see if she has been able to secure a copy of the birth certificate that verifies the partner details one way or another. The dust has settled and it's a lot easier to move around the hotels and bars of Pattaya asking if they know Unsworth etc. I have met with one hotel owner and the records for the hotels which are a simple check in book are held by the previous hotel owner for the dates that interest us. I am meeting with him tomorrow as he is now retired but on the phone he has confirmed that he does have the old hotel registration books and will allow me to copy them. I will be staying in Thailand until we have exhausted all avenues and have completed the task.

Update on Unsworth is that he is returning to the UK next week and has confirmed meetings with his legal team Howard Kennedy on Tuesday and Wednesday.

I will keep you updated when I have further information.

Kind regards,
James

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On 12 Sep 2018, at 04:33, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Also, I can help but think that after his random and unprovoked initial attack on our principle, he has made enemies. They will likely know his dirt.

On Tue, Sep 11, 2018 at 7:52 PM James Brickhouse <jbrickhouse11@gmail.com> wrote:

James,

I didn't hear from you today. I suppose you've made it to Thailand by now? I look forward to an update. Clearly we'd like to gather as much relevant information as possible, but we of course need to ensure it is done carefully and legally. Has there been any progress in Pattaya?

On Fri, Sep 7, 2018 at 2:21 AM Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

Let me clear up the marriage issue. All the papers after the first Twitter fall out in the UK reported that Unsworth was married. It was not until the investigation team spoke to her sister that we learnt that they have had a wedding but, they did not complete the necessary registration with the local authorities. They regards themselves as a husband and wife, this however is not legal in Thailand. If her age is 30 then they met when she was 18/19. If she is in fact she is 40 then its they met when she was 28/29. The lead Thai investigator has arrived in Chiang Rai this morning to go to the town hall to obtain a copy of the birth certificate so we have proof you requested.

What I am doing now is reviewing all the evidence as its collected and then verifying this myself. I am also flying to Bangkok tomorrow morning to take charge of the investigation in Pattaya. I feel now that this is where the results will be found if they exists and I want to control the flow of information.

I will report further developments later today.

Kind regards,
James Howard

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On 6 Sep 2018, at 20:00, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Please assure your source that we will not expose him or his information. Please understand that as of this moment much of what you have told us can't be verified. Our request for actual documentation is to confirm that we are being given legitimate information. The info that you said was leaked to the press wasn't actually leaked to the press. It was an off the record comment (which disgracefully was not respected as such and instead published) meant to encourage the journalist to actually do some due diligence rather than simply make assumptions. It doesn't seem too difficult to get something verifying her age, a document confirming travel records or a copy of a newspaper article. These things are vital simply for us to know that we are getting legitimate information.

Regarding your follow up comment, we were told numerous times that they were 'married' (or formed a relationship) in her late teens (you said 18), but that she was quoted in a newspaper saying they met 7 years prior. Does a copy of that article exist? Can you send it along? It appears this narrative has changed, or information was relayed based on broad assumption and that's what has us asking for legit verification. Because based on that original narrative she would have actually been a child/young teenager when they first met.

With that said, let's focus on what we can do now to be productive, move toward the objective and verify some of the key data. Do you have a definitive way to confirm her age? Have the guys found anything new in Pattaya?

On Thu, Sep 6, 2018 at 10:14 AM Jupiter Military & Tactical Systems
<info@jupiter-private.com> wrote:

Jim,

Just to clarify the points you made. The investigation team in Chiang Rai was able to establish a number of important information. I made the assumption based on what was reported back to me that if her age is in-fact 30 and not 40 and that she has been married (not legally) but in a religious context for 7 years plus we also know that she was dating Unsworth for at least a further 3 years prior to this then she would have been in her late teenage years when they met. I believe I told you that I thought this would have been about 19. There is a big difference between 19 and 29 I agree, and an even bigger leap to being a child rapist. I do not know how anyone could come to that conclusion as neither of us have ever mentioned children or rape in our conversations.

Today is the Thai Governments big celebration with over 60,000 expected in Bangkok. Our source at the Embassy is naturally extremely concerned about his information being used by the 3rd parties in further exchanges with the media. What assurances can I give him? You require evidence that can be used by the foreign press to show Unsworth was a regular visitor to Pattaya which is a well known haunt for sex tourists. Yes, the team are in Pattaya and developing the best strategy to qualify the information we have and then hopefully finding someone who knows unsworth and will give a statement.

The UK Embassy will be back to normal staffing tomorrow as it was closed this afternoon in preparation for this evenings event.

I have taken onboard what you have said and if I thought the information I gave you would be leaked to the press then we would have triple checked everything. This is not how we normally work. We would normally gather all the data we need to make our case findings and then go over it in fine detail and then present it.

I am gathering the information you require as quickly as humanly possible.

Kind regards,
James

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On 6 Sep 2018, at 17:53, James Brickhouse <jbrickhouse11@gmail.com> wrote:

James - I hope to receive additional information today. I assume the team is still engaged in Pattaya?

Also, as you may expect, I have spent time over the last 24 hours compiling the information you've provided. Not to beat a dead horse, but to briefly revisit the point below, you never did report that the target is a child rapist. However you undoubtedly understand where the principal was drawing this conclusion from. You reported in multiple phone conversations that the age of the target's girlfriend (believed to be his wife at the time) would have put her in her teens when they 'married' and that she was quoted in a Thai news article saying they first met 7 years prior to that - which would have made her a very young teenager at the time. Some (all?) of this information has now proven to be wrong. They aren't married and her age is unconfirmed. I also haven't seen the Thai article you referenced. So while I agree that the comments by the principal were ill advised, you can understand that using the data you provided would have allowed him to draw this conclusion without you explicitly reporting it as fact.

J

On Wed, Sep 5, 2018 at 7:51 AM James Brickhouse <jbrickhouse11@gmail.com> wrote:

There is no confusion where this is concerned. You have not reported this and I have not communicated it either. I understand your concern about self sabotage. A concern of mine as well.

On Wed, Sep 5, 2018 at 2:00 AM Jupiter Private <info@jupiter-private.com> wrote:

Jared, I would like to state the following. At no time have I reported that the target is a child rapist.

We need to be clear about what we are looking for. The target had a traveling pattern that shows he spent time before he moved to Northern Thailand in Pattaya. We are qualifying what the target did on his travels and will report back as soon as we have that information.

What I can confirm is that he is about to launch libel action and we are working as quickly as possible to defuse that action by clearing showing a behavioural pattern that replicates a sex tourist. That task is now difficult time complete in a

covert way. The recent buzznews comments will be big news in Thailand.
Tomorrow is the national celebration of the rescue & is still big news in Thailand.

I feel that an appropriate course of action is to try to avoid the public circus & instruct Kieth Oliver to meet with Marc Stephens to open a channel of communication whilst we attempt to continue our investigations. Every effort is being made to ensure accuracy & we know this now may required as evidence in a UK court & I would have to show how the evidence was collated.

I suggest a telephone call to discuss the strategy & impact.

Kind regards,
James

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On 5 Sep 2018, at 01:20, Jared Birchall <jaredbirchall@gmail.com> wrote:

So are you saying you don't have the data gathered?

On Tue, Sep 4, 2018 at 3:53 PM Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

I appreciate that you need quick results. I am very confident that we will get what we need from Pattaya.

I appreciate its open season on "the principle" holds the moral high ground and right now the less said is more.

Elon has nothing to prove to anyone!! Unsworth made this happen, not Elon.

We know Vernon is a 'bad boy' and we are close to having the evidence we need.

Jim I cannot stress enough that we need some time to qualify the data.

We will have one shot to get this right and I intent to do so,

Kind regards,
James

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<image002.jpg>

<image002.jpg>

EXHIBIT 25

EXHIBIT 25

Messages - James

iMessage
8/24/18, 8:14 AM

Jim please call when free. James

8/28/18, 9:55 AM

Jim are you free for a conversation ?

In 10 minutes

Now works

8/28/18, 3:20 PM

Jim, in order to proceed as discussed I will need some additional funds. I am close to the limit of the 20k USD for the stage 1 of the investigation which is still ongoing.

I will work with a very old friend Michael Smith who has a credible background and would be the right buffer to ensure there is zero cross contamination. I am sure you appreciate this has to be dealt with in a very sensitive way.

[https://en.m.wikipedia.org/wiki/Michael_Smith_\(newspaper_reporter\)](https://en.m.wikipedia.org/wiki/Michael_Smith_(newspaper_reporter))

Can you authorise a further 12k USD to expedite the second stages of the project as discussed.

Please advise. James

Yes, we can get it sent out first thing tomorrow. What is the timeline?

Jim timeline is ASAP I am meeting Mike at 0800 GMT to begin the process. It has to appear organic & not contrived.

Priority is to divert the story away from the principal and let the UK tabloids develop there story.

Great

8/28/18, 10:27 PM

Would be ideal to have more than one publisher receive the info. I trust you are likely already doing this.

100 %

Plan is to reach out indirectly to 3/4 different newspapers & print & online.

Messages - James

Sounds good. Hopefully soon.

This will begin in 90 mins & then be pushed out today. The difficulties will be getting the editors to ok that line of enquiry & for them to feel this is a better story than the principles activities.

Ok

It's hit & miss, the Sunday Papers may be the best bet. Timing is good as not much else of any significance is happening right now

I'll call them update you this evening

Ok

A big part of this is the willingness to recognize the fact that Thailand is the capital of pedophilia. Among many other notables who have been caught is the Subway sandwich spokesman Jared. I'm sure there are others. Could even be part of the story: <https://www.hollywoodreporter.com/news/jared-fogle-tapes-subway-pitchman-835552>

Most in the world - especially in the US- don't understand this fact and Thailand goes to great lengths to keep it quiet. I'm told people regularly disappear when found exposing the 'land of smiles'. In the end, anything that uncovers a disgusting ongoing practice that just might protect some children is worth it. So it could easily be spun as: The possible explanation of Elon's accusation. The sad/real truth behind Thailand and ex pats.

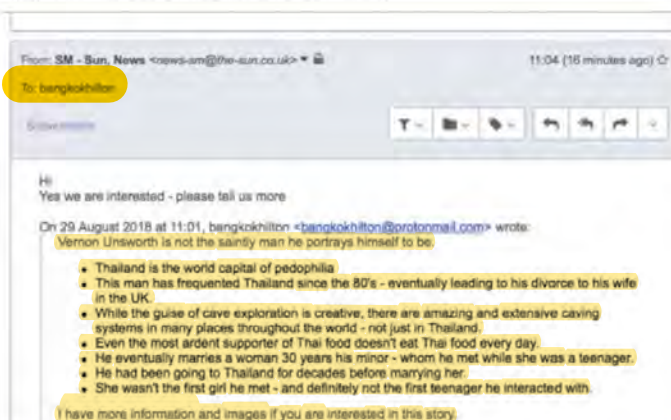
Agreed & will be spun in

Unfortunately there is a lot of truth in that story - the UK readers are already familiar with Thailand & its culture to welcome & protect sex tourists. We call it 'Yellow Fever' where older men leave their wives for a young Thai friend.

8/29/18, 3:25 AM

Messages - James

(8) Thailand Brit Divers Untold Story



Jim example of what we are doing with all the daily newspapers and Sunday papers

Jim have you seen this

<http://www.dailymail.co.uk/news/article-6108365/Elon-Musk-doubles-pedo-guy-claim-British-diver.html>

8/29/18, 6:27 AM

<http://www.dailymail.co.uk/news/article-6110117/British-cave-divers-mother-insists-son-taking-legal-action-against-Elon-Musk.html>

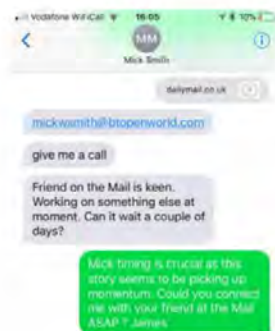
So nothing out yet has your info?

Are you up and free to speak ?

In about 45 minutes

Processing very very well

Messages - James



Daily Mail are now interested though Mick Smith. Thats the paper that will have the biggest impact

Ok, good

8/29/18, 10:51 AM

The principle is big UK news this evening

yes

8/29/18, 12:37 PM

wire was sent

Please let me know when you have word of a story with your narrative being published.

8/29/18, 7:52 PM

Other thought, maybe we consider the Australian press as well. The UK press may be prone to protect one of their own.

Part of the narrative here needs to be the extreme level of darkness that most don't know exists. The movies show some quirky and bizarre stuff - but the extreme depths of horrific sex trafficking that actually occurs is mostly hidden.

Ok

Messages - James

Also, while I've obviously pushed for immediate results, I also realize this may need to be a lengthy investigation. So let's continue forward with that in mind as well. Any additional expertise and resources, creative measures and strategies should be explored.

8/29/18, 10:12 PM

Jim all understood

Target is in the UK until Nov 5th when he will return to Chiang Rai for a family party.

He's now living with his mother in Braintree, Essex. Clearly he will be using this time to mount his legal response - I have images of the home & work addresses in Thailand.

Target has been telling locals how much money the Principle is going to have to pay him etc so he's shown his hand & motivation

Ok

When you say work addresses, what work addresses?

And did he recently go back to the UK? The story isn't as compelling if he's actually living in the UK.

His wife & Vernon have an office above his wife's mother's shop. I'll send over an email with all this info later this morning

It would be good to verify when (if) he actually engaged council. Is that letter that was posted on twitter legitimate? or post dated?

I will look into that

<https://twitter.com/rmac18/status/1034817540495564801?s=12>

He arrived back in London 2 days ago specifically to meet with the UK Cave Council who are concerned at the PR fall out & to peruse his libel claim. 5 week visit to the UK - he's domiciles in Thailand

Just heard from the team on the ground that we have quite a lot of info coming in this morning & I will keep you updated

How are we getting that info about the UK cave council? And related PR concerns?

Messages - James

Bill Whitehouse MBE
Vice chairman
British Cave Rescue Council
Reg. charity no. [1137252](#)

01298.871661

I have spoken to Bill Whitehouse as a rep of the UK Charity interested in the target as an ambassador

Reached out from one charity to another to ask about possible skeletons in the cupboard & he let slip that this negative press was diluting the rescue story

The Thai Gov will also be watching this develop with interest



Mark Stephens is a punchy UK media lawyer

I can only advise the family office to have a preliminary conversation with Kieth Oliver of Peters & Peters

Stephens will be the UK legal adviser to the target

Messages - James

Confirmed that he has been retained by unsworth?

No

But I can find out

Later this morning

I know another partner at the law firm

Can make a social call & make a soft enquiry

Who is heading up the legal response from your side

We are solidifying that now

8/30/18, 12:01 AM

Interesting, looks like he retained a lawyer in the US, Georgia based L. Lin Wood.

Yes

But using a prominent UK to manage the target. You need to counter punch with a UK heavyweight

I'm happy to reach out to Keith if you wish me to see if he has the appetite. In the UK the damages for libel would be about 100-125k given his low income & minimal damage as he had no reputation to speak of. In the USA it's a different calculation! As you know damages can be ridiculous

So you believe he'll file suit in both the US and the UK

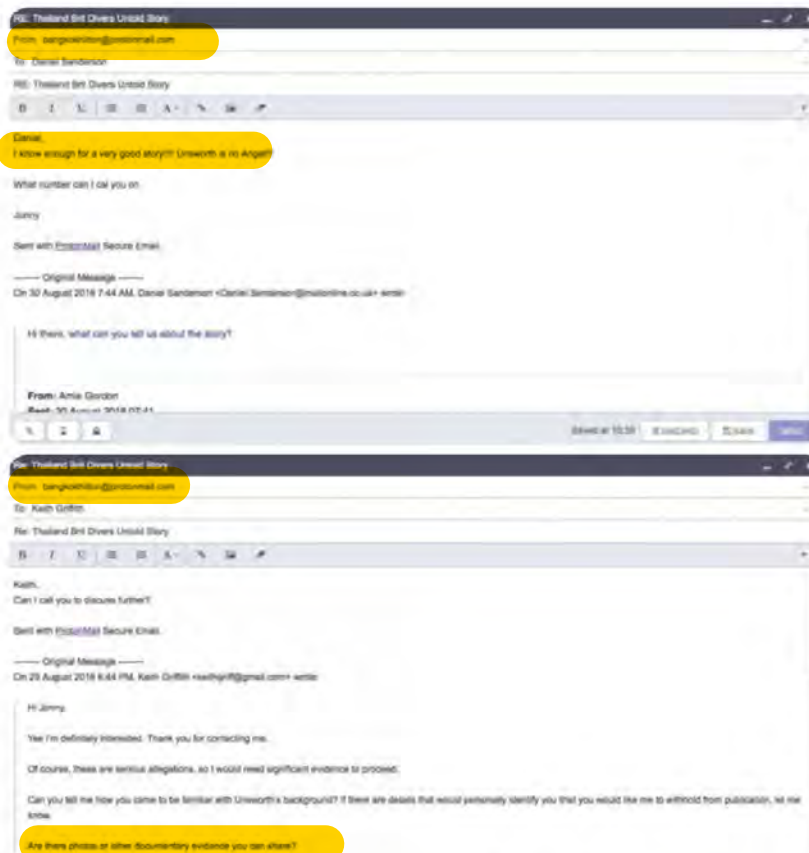
No I think he'll only file in the USA

I will no more later

He's going to be under pressure now from the cave diving community & the UK press. I will keep the pressure on all day as discussed

8/30/18, 2:42 AM

Messages - James



8/30/18, 4:59 AM

We are also looking into his diving qualifications? Checking to see if they are in date? Just thinking outside of the box. Although he was a volunteer it wouldn't look good for the Thai authorities if something was out of date etc.

Have lots of images for you, do you use WhatsApp ?

No, but will set up shortly and circle back to let you know.

Apologies

8/30/18, 7:11 AM

Sent you an email asking for a comprehensive report to date. Do you have one?

Jim just replied - in short I can put everything together to date for you. Can you call when free

8/30/18, 11:11 AM

Messages - James

I'll call in 3 minutes

8/30/18, 1:24 PM

Jim I think there would be a lot of value in speaking with Keith Oliver. You can have some options with superinjunctions which are popular in the UK and could dissuade and tie up the target. Happy to make an intro, it's another avenue that should be explored. Rgds James

Ok, I'll circle back on that today.

Might be an easy way to silence Unsworth in advance of any law suit & put a lot of pressure on him

Just confirming we are also exploring Australian and other international press that have unmasked these issues in the past?

Affirmative

I am spending all my time educating journalists

Carrot & stick

<http://center4girls.org/human-trafficking-in-thailand-chiang-rai-province>

<https://www.straitstimes.com/asia/se-asia/idyllic-thai-province-hides-a-dirty-secret>

Thank you for the information.

8/30/18, 11:03 PM

Any further instructions

Any news on media?

Too early for that

Richard in Bangkok is following up the Australian media

Ok

Just need to make sure the team in Thailand keeps digging. Creatively, extensively and when possible, aggressively.

Messages - James

Of course. But bear in mind I am the only link on the chain who knows who the beneficiary is. The Thai team & Richard all believe that this effort is for a children's charity in the UK. They are all professionals who will give 100%. I'm met with a partner of Howard Kennedy last night who confirmed that Unsworth has been to the London office for meetings. I suspect he's co-ordinating all this through a London law firm so they can manage the London newspapers. Please have a think about lawyering up in London. It won't have a cost to have a conversation and get an opinion and at least have someone ready to ascot quickly. In the UK it's about reaction times and skill. Allot can be done in the UK to protect Elon with superinjunctions to stop the other side from speaking to the press if that might damage 3rd party shareholders. You maybe served in the usa but I think Unsworth will want this managed by a UK firm. Happy to assist, please advise. Rgds James

8/31/18, 8:55 AM



Keith Oliver.vcf

8/31/18, 1:00 PM

Jim do you have a secure Dropbox or equivalent I can use?

9/1/18, 12:14 AM

Let's discuss in the morning.

Sure the report is large so wanted to send in this format. Any instructions from the principal?

I'm proceeding with the UK surveillance as discussed

9/1/18, 8:32 AM

Jim update sent to you

Received, thank you.

9/1/18, 10:36 AM

Jim would you like to chat through the report ?

9/1/18, 12:41 PM

Does in an hour or two work?

Jim call anytime

Page 10 of 18

Messages - James

9/2/18, 9:18 AM

Jim I have an update for you. Please call when free

9/2/18, 12:39 PM

Jim did you have time to think about a conversation with Keith Oliver to chat over options exchange NDA's etc.... I still believe that there is massive benefit in doing this for Elon.

9/3/18, 7:17 AM

Target meeting Mark Stephens today at 1600 to put libel plan into place. Confirmed the UK office of Howard Kennedy will run the libel action through Mark Stephens

Meeting is scheduled for 2hrs

9/3/18, 9:13 AM

We will bin spin him tonight and again after he has left the UK back to Thailand

Very happy demeanour



9/3/18, 11:23 AM

Messages - James

Jim I have deployed x3 investigators to Pattaya and I still believe there is value in the UK surveillance. My plan is to wait for the Pattaya evidence then package it up for the x2 journalist in Australia & x 2 in the UK who want to run this story in both daily and Sunday papers.

Pattaya will take some time probably 7 days. There is a mountain of work to do there. I have used the 20k USD for the original investigation, in Thailand, the other 12k has gone into journalist development, which we are holding back on until we have the smoking gun.

Can you authorise a further 20k USD ? This is to cover the UK surveillance and Pattaya investigation. James

Yes, I am hopeful that will get us where we need to be.

Can send tomorrow morning. Today is a US bank holiday.

Understood we will proceed as discussed

9/4/18, 9:49 AM

Jim, could you call when free. Have an update for you

I just tried calling. Please call back.

Just confirming the funds were sent on our end.

Rgr that

Can you confirm the hotel names in Pattaya? And you said 2 of them are considered standard destinations for expats with bad intentions, correct?

Correct

Penthouse Hotel x stays

Dusit Thani - 4 week stay

Penthouse hotel is purely designed for sex

All of the hotels he stayed at & the apartment he used in 2009 are within 100m of the red light area called 'walking st'

What other purpose could there be for using a hotel with lap dancing poles in the rooms?

Messages - James



9/4/18, 11:56 AM

Jim, our goal is to get evidence from the penthouse which is obviously a big win. I'll keep you updated.

I've text Keith Oliver to give him the gypsies warning about your phone call

Jim was that enough information?

yes, thank you

Did you have any legal clarity from Keith ? I believe he could be a massive help in finding the path of least resistance. Rgds James

I called and left him a voicemail. He didn't pick up.

9/4/18, 2:28 PM

<https://www.buzzfeednews.com/article/ryanmac/elon-musk-thai-cave-rescuer-accusations-buzzfeed-email>

Please call ASAP!

1 min

Ok, thanks

Back at home

9/4/18, 5:23 PM

So no summary?

Messages - James

9/4/18, 11:00 PM

Was sent last night

9/5/18, 8:01 AM

Sorry, I can't talk right now.

Just taking off on a plane. Will be in the air for about an hour.

Rgr

9/5/18, 9:07 AM

The recent article says his girlfriend is 40.

Yes we are checking with the investigating team, mother said 30

Are you free

Just landed and need to get off the plane

9/5/18, 10:21 AM

To reiterate, documented verifiable evidence is super critical.

Jim all understood, we are retracing our footsteps to ensure accuracy. I understand your position. I am concerned & don't want to risk exposing our sources if the principle is likely to publish them. I have requested the info you need. I have relayed your timings request & I hope you have what you have asked for this time tomorrow 1800 GMT

Please rest assured our intent is not to expose sources or any direct information that we shouldn't have. We understand the sensitive nature of the work.

Understood but I want to get this right and I don't like or accept mistakes. I have run EP & investigations for George Soros and Paul Allen since 2005 so I know the pressure you are all under.

No Good Deed Goes Unpunished

9/6/18, 9:02 AM

Jim all uk embassy staff our at the Thai celebration & I am waiting for a report from Richard in Bangkok. I am also waiting for verification on the age of 'Tik'. I will update you as soon as I have an update.

ok, thank you

9/6/18, 12:13 PM

Messages - James

Have we check their social media accounts for history and age info?

Jim, yes Tik's Facebook account which is the only social media she has does not list her age

Ok, is it public or private? And he doesn't have one?

We are not looking at Vernon's age as we have that and yes he's has an Instagram and Facebook acc. Both are private but our female investigator who has befriended the mother in on Tik's Facebook acc

Ok, got it.

Did one of the guys end up going to the celebration?

Yes Richard is there to try and get close to the target to see if he can overhear any conversations

ok, sounds good

Jim please be assured everyone is going the extra mile on this. I appreciate the pressure you are under. I also want to deliver. I'll be up for another 6-8 hrs

Ok, thank you. Based on developments in Pattaya, do you believe we will be successful in gathering any data from the Hotels? Or are they more prone to stonewall?

Jim, honestly this is a hot topic in Thailand. The story is on all the TV channels. Right now it's like juggling lite sticks of dynamite. The most recent comments have made the investigation much more difficult. But yes I think we will be able to show that he was a man who lived in the pattern of a sex tourist but we need irrefutable proof before you sure that please.

share

Of course. Agreed.

are we making any progress on verification of birth date?

I've dispatched the Thai investigator back to Chiang Rai to obtain a driving license or birth certificate or national ID. This should not be difficult to obtain. As soon as she has a copy I will send this to you

Ok, great

9/9/18, 9:17 AM

Messages - James

Jim will call you later to provide an update.

9/10/18, 6:23 AM

Jim, I will call you at 0900 LA time. Op has picked up again after I have had a full debrief and we have agreed the strategy moving forward. It's probably a good thing that dust has settled a little bit.

9/10/18, 9:59 AM

Jim are you free ?

Yes

9/12/18, 9:45 AM

What's the latest?

Jim sent you an email. I will update you a little later on & call.

Jim I'm in a bad signal area. I'll call you back when I've moved.

ok. I was going to mention that someone sent what appears to be her birth record confirming she's 40. Very unfortunate to have had that wrong, but appears to be the case. But as you know this is only part of the equation. It seems near impossible that this guy has walked in the circles that he has, spent as much time there as he has and hasn't left some trail of his devious behavior. We must find that trail.

Agree with that

It would make sense about the birth certificate as we where told some else had applied for a copy. Seems an incredible mistake to make but perhaps the mother was just plain confused. At the end of the day the buck stops with me and I take full responsibility. As you say I still believe there is value in tracing his footsteps in Pattaya. We have plenty of budget left & with this mistake I won't be asking for funding. I don't what else to say, Jim. If we can get smoking gun that will go in some part to restore credibility.

Agreed

9/18/18, 9:42 AM

Jim please call when free

Jim what time is good to call ?

Anytime

Messages - James

Jim we are having a wash up. The answer to your question about when Unsworth first came to Thailand was we believe 29yrs ago in the late 80's. What is the latest from the law suit in the USA. Has this also been served in London ? Have you spoken to Keith & taken advice? James

9/19/18, 8:10 AM

Jim I'm available to speak. My reception is not great so if you can't get through text me and I will move to a better place

9/20/18, 8:15 AM

Jim just to confirm the information that Unsworth has been coming to Thailand for more than 2 decades came from his wife who befriended our female investigator. They are also getting hard evidence from Thai government channels of this. She was very clear that Unsworth regularly traveled to the Thai / Malaysia border to explore other cave networks many years before they met. I have asked for that evidence to support our end regardless of costs.

9/20/18, 10:45 AM

Jim please bear with me it's Thailand and nothing happened quickly but the goods will come. I am very confident of that. I know it's slow but we are working in a 3rd world country and everything is analogue. I'm back up in Bangkok & will report back to you when we have what you need. James

You've made some pretty specific claims that contradict his legal filing. But at this point we have nothing to confirm any of them. We need something, anything that can support your claims.

Noted Jim and this is what has been reported to me so I am doing as you asked which is provide supporting evidence.

9/23/18, 8:55 AM

Jim we believe we will have the evidence you require to dispute his travel claims this time tomorrow. Regards James

9/24/18, 12:01 PM

Ok where is it?

Jim it's coming to me. It's Thailand. It will materialise!! I'm not leaving to the UK until this is finished

10/2/18, 7:21 PM

Messages - James

James - go back and review the information you've provided aside from the initial info. You've just about given us nothing. And you have given exactly nothing verified.

Read 10/2/18

10/2/18, 11:03 PM

Will do so. We have given you all that we have found. Which to date is not allot apart from what I have sent. I'm travelling to France to bury my step-father & will be back in Bangkok this Friday. I put all the info we have in a spreadsheet and then relate the source & what has been verified & what we are not able to to confirm.

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Exhibit 25

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MUSK_000216

EXHIBIT 26

EXHIBIT 26

From: Jupiter Military & Tactical Systems
Sent: Sat 9/01/2018 8:14 AM (GMT-07:00)
To: "Jim Brickhouse" <jbrickhouse11@gmail.com>
Cc:
Bcc:
Subject: Rowena Update 2
Attachments: Project Rowena Update 200001.pdf; image00200002.jpg

Jim,


Some points for further discussion. Please call when free.

CLOSE HOLD

Project ROWENA Update 2
1st September 2018

CLOSE HOLD

CLOSE HOLD

Subjects Full Name	Vernon Harry UNSWORTH
Date of Birth	██████████ 1955
UK Passport No. ██████████ Issued London 28/09/2010	VERIFIED
Criminal Record Search	No civil or criminal charges have been recorded within the United Kingdom or Thailand
Sex Offender Register	No Sex Offenders registrations recorded within the EU EU Offender Search includes current and historical sex offender registration records from all EU member states this also includes List 99 and the Interpol register. <i>Please note that the type of crimes that require registration vary by EU member state therefore not all individuals convicted of a sex crime in one EU member state may be included in another EU member state's registry.</i>
Credit Check	No adverse records or outstanding judgements recorded at the UK address provided above. No indication of financial stress.
Current location - Owned by Mrs Vera Unsworth	██████████ Essex, CM7 1AP - Verified 
Investigation Update Thailand Source: Mother, Sister in Law & Neighbours.	Vernon Harry Unsworth He is fascinated in cave exploration all over the world and he has been doing it for over 40 years. He usually went with his team. He is telling locals that should his libel action be successful he is planning to open a Cave tour business in Chiang Rai. Themed tours of the rescue with Vernon as the subject matter expert. He also had until recently another business importing digital Coffee Tamperers. Established in 2016 and called "Eazytamp Thai" Unsworth claims that these re-sell throughout the nation. The couple recently bought a piece of land, which is close to Tik's mother house, about 2 km. They are planning to build a house as well as a small resort there. Now it is a rice field. Before Unsworth left for the UK he told locals that the house he will now build will be double because of his libel action. Mr Unsworth has made an application to explore more caves in the Tam-Huang region and is hoping that the Discovery channel will be interested. At the same time, he will also explore a cave in Naan province with his team.


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	<p>Mr Unsworth will return to Thailand on the 5 Sep 18 at the Suvarnabhumi Airport, Bangkok. His arrival time is at 1500 LCT and Tik will fly to meet him at 1600 Hrs LCT.</p> <p>They will both attend to the "thanking party" at 6pm-21pm at the Dusit Palace, Bangkok. The party was held by the Thai Government. 60,000 people are expected to join in these celebrations and Unsworth will be one of the guests of honour.</p> <p>Unsworth currently stays in Thailand by using a Tourist Visa which he has done so for the last 7yrs. He sometimes extended his visa by crossing the border in the Maesai district, sometimes traveling to Vietnam. The Thai Government will now renew his Visa as he now has VIP Visa status as a result of the rescue, for a long-term stay.</p> <p>He will stay in Thailand about 8 weeks and he then plans to return to the UK.</p> <p>Vernon was previously married to an English lady Vanessa Unsworth and they have one son Nathan Unsworth.</p>
Next Steps	<p>THAILAND</p> <p>We are very confident that Unsworth was a frequent visitor to Pattaya Beach the decade before he met Tik. We suspect this is where he developed his taste for young Thai girls. One of the lines of enquiry we are following is to go through the archives of the UK embassy in Bangkok. This will begin on the 3rd Sept. On each Visa application Unsworth would have had to have listed the hotel or apartment that he was staying at during his visit. If we can verify this, then we can pursue a different line of enquiry and try to find 'sexpats' who runs bars/nightclubs in Pattaya who may remember Unsworth. We have multiple sources from expats who were on the rescue team and Unsworths Thai friends who all say that he used to live in Pattaya before he met Tik.</p> <p>UK</p> <p>We will begin active surveillance on Unsworth in the UK on Sunday 2nd September until he returns to Bangkok. He has already met with renowned media specialist Mark Stephens who is assisting in the potential claim. Stephens heads up Howard Kennedy's media law and regulatory team and has represented a number of high-profile clients including WikiLeaks founder Julian Assange. Any libel actions brought in the UK as defamation are much easier to bring than the USA and there would also be jurisdictional issues given that Unsworth is a UK citizen. I will confirm when he is meeting again with the Howard Kennedy team. I have a source within the company who may be able to reveal some of the strategy and timelines.</p> <p>I would strenuously recommend that you use the services of Keith Oliver of Peters and Peters. Keith knows mark Stephens very well and will be able to predict and counter his next move. https://www.petersandpeters.com/lawyer/keith-oliver/</p> <p>I would also recommend using Alexandra Marzec as the lead council in the team. I think it's important you have someone who can manage the UK and International press and have the face of a strong women behind the principle. It adds credibility & ticks a number of the diversity boxes. http://www.5rb.com/member/alexandra-marzec/</p>

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Subjects Full Name	Voranun Radravipakkun (Nickname - Tik) wife on Vernon Unsworth.
Date of Birth	November 1988
Address in Thailand	Chiangrai Thailand - VERIFIED 
Current location	Currently in Huai Krai (home village)
Investigation Update Source: Mother, Sister in Law & Neighbours.	<p>Q. When did Unsworth first move to Thailand? He moved to Thailand on a fulltime basis about 7 years ago. (He first visited Thailand 19 years ago for his cave exploration & beach holidays the South of Thailand)</p> <p>Q. Why did he choose Chiang Rai, or was he based somewhere else previously – Pattaya etc.? The reason that he has chosen to live in Chiang Rai is because of the extensive local cave networks. Chiang Rai has plenty of interesting caves, especially in Tam Luang. He believes that he can still explore more about the cave networks.</p> <p>Secondly, his partner Kun Tik is from this hometown and also, she has a small plot of land. Tik also has to take care of her family i.e. her Father, Mother and Daughter (from an x-partner) and her job is close to Chiang Rai.</p> <p>Q. We understand he may have a coffee shop in Chiang Rai – is this his source of income? He opened a small coffee shop in 2016, named "Cha-Pa-Yom" which it is located in Mae Fha Luang district. It was a small coffee stand. It did not provide a source of income for Mr. Unsworth.</p> <p>Q. Where does he live and what lifestyle does he lead – expensive house/condo? For long periods of time, they would stay with Tik's parents house. Her mother's house is also a small grocery shop. It has been in business since 2011. "Wan dee" is the name of the shop, which located in Baan San-Yaao 99/1 Moo. 3, Huai Krai sup-district, Maesai district, Chiang Rai Province. It's a one floor house and it belongs to her family.</p> <p>Q. Is he actually married to Khun Voranan? They are not legally married and have not made an official registration, but they did have a wedding ceremony according to Tik's family traditions.</p> <p>Q. When did they meet and how did they meet? They both met each other in England 11 years ago. Tik had a summer vacation and visited some student friends there. A friend of hers introduced Tik to Vernon. That was the beginning of their relationship.</p>

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	<p>Q. How old was she when they met and what was she doing for a living at that time?</p> <p>During that time she met Vernon she was about 19 years old and at that time she worked in a chemical company in Bangkok.</p> <p>Additional information; Miss Woranan Ratrawiphukkun Her previous name was Suvimon Chomkeaw DOB [REDACTED] 1988 Age 30 Phone number [REDACTED] Drives an MG. Light blue colour, licence plate no. [REDACTED] Chaing Rai She is currently working as a Secretary of Chief Executive of the SAO at Huai Krai SOA for 7 years. She left her old job in Bangkok & then moved back to her hometown in order to open the grocery shop. Her mother now runs this store.</p> <p>She has one daughter who is 14 years old. Tik also has one younger sister. Her sister is married and moved to another province.</p> <p>She Graduated in bachelor's degree in Chaing Mai Rajabhat University in Business Management.</p> <p>She has another business called "Elegant Nails & Beauty Spa". There are 2 branches: 1st Branch is located in front of Mae Fah Luang University Address: 489/1 Moo. 1, Super high-way Road, Tha-Sud sub-district, Mae Fah Luang district, Chiang Rai province.</p> <p>2nd Branch Address: Baan doo 421/1 Moo. 3, Nang-Le sub-district, Mae Fah Luang district, Chiang Rai province. Opening hrs from 10.00 to 21.00 Hrs.</p> <p>Her business is solvent with a strong repeat customer base. There is little no local competition and this is her main source of income. She opened her business in 2013. The rentals cost 8,000 baht/month. - \$240 per month</p>
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IMAGES

Unsworth working in the family shop



Tik in one the "Elegant" Nail Salons



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Tik with 14yr Old Daughter



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Images sent to Australian and UK Press

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Unsworth With a Taste for Younger Women



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Failed Coffee Business



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CLOSE HOLD



EXHIBIT 27

EXHIBIT 27

From: Sam Teller
Sent: Mon 7/15/2019 8:09 PM (GMT-07:00)
To: Jehn Balajadia
Cc:
Bcc:
Subject: Fwd: From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Begin forwarded message:

From: Reyna Ortiz <reyna@spacex.com>
Date: July 17, 2018 at 8:00:56 PM EDT
To: Sam Teller <steller@spacex.com>
Subject: Re: From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Nope don't believe so. Not sure how he got my email – just seemed a little odd what he mentioned.

From: Sam Teller <steller@spacex.com>
Date: Tuesday, July 17, 2018 at 4:59 PM
To: Reyna Ortiz <reyna@spacex.com>
Subject: Re: From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Have we interacted with this person before?

On Jul 17, 2018, at 4:41 PM, Reyna Ortiz <reyna@spacex.com> wrote:

FYI – Fine to ignore?

From: Jupiter Private Office <info@jupiter-private.com>
Date: Tuesday, July 17, 2018 at 8:51 AM
To: Reyna Ortiz <reyna@spacex.com>
Subject: From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Dear Reyna,

I am having difficulty contacting Elon. Could you pass on the email below. Like Elon I think that Mr. Unsworth has skeletons in his cupboard.

Kind regards,
James Howard
CEO
Jupiter Military & Tactical Systems
+44 (0) 7917 401601
+44 (0) 7388 539104
info@jupiter-private.com

www.jupiter-private.com

<image001.jpg>

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From: Jupiter Private Office [<mailto:info@jupiter-private.com>]

Sent: 17 July 2018 16:03

To: 'ElonMuskOffice@TeslaMotors.com'

Subject: From James Howard - Vernon Unsworth - Past & Present

Dear Elon,

You may wish to dig deep and look into Mr. Unsworth past to prepare for his defamation claim. No smoke without fire!

I can discreetly assist & have a team in Bangkok.

If you wish to engage please call me.

Rgds,

James Howard

CEO

Jupiter Military & Tactical Systems

+44 (0) 7917 401601

info@jupiter-private.com

www.jupiter-private.com

<image001.jpg>

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EXHIBIT 28

EXHIBIT 28

From: <jaredbirchall@gmail.com> on behalf of James Brickhouse
Sent: Wed 8/15/2018 5:33 PM (GMT-07:00)
To: "Jupiter Military & Tactical Systems" <info@jupiter-private.com>
Cc:
Bcc:
Subject: Re: Follow up from James
Attachments: One Way Non-Disclosure Agreement For Contractor00001.pdf

Thanks, James. We've signed and attached the NDA.

We'd like to be able to do this for \$20,000 dollars. Does that work for you?

Thank you,

Jim

On Wed, Aug 15, 2018 at 12:05 PM, Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

Attached is the NDA which should be from you to me if I am the contractor if that makes sense.

Investigations as I'm sure you will know can be time consuming and are event driven. I think I have a clear remit of what specifically you are looking for and the starting point would be in the UK and in Thailand.

The UK end it quite straight forward but if there are any skeletons in the cupboard they are more likely to be in Thailand which is where I will centre the investigation.

Typically I have always worked on a retainer with these types projects and I would prove this at two men for ten days at £900 GBP per day.

That would be £18,000 for a full background investigation which would look at lifestyle choices for the target known associations, discreet enquiries in the target's place of work and relaxation.

The target is unlikely to have a history of offending in the UK as this would already have come to the surface but I think like others that his motivations for residing in Thailand may unearth some unsavoury practises and relationships.

I can provide professional references if requested.

My career in short is 11 years in the UKSF and 2 years with the UK Security Services.

Over the past 15 years I spent 10 yrs working for Vulcan Inc (Paul Allen) running his maritime and European EP and for George Soros.

Please call if you have any questions at any time.

Kind regards

James
CEO - Qatar & UAE
Jupiter Military & Tactical Systems
Al Saad – Area 38
Street No. 893
Building No. 7
P.O. Box 22509
Doha, State of Qatar
+44 (0) 7917 401601
info@jupiter-private.com
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On 15 Aug 2018, at 18:40, James Brickhouse <jbrickhouse11@gmail.com> wrote:

EXCESSION, LLC

On Wed, Aug 15, 2018 at 10:23 AM, Jupiter Private <info@jupiter-private.com> wrote:
Jim, can you send me the corporation name and contact info for the NDA.

Regards,
James
CEO -Qatar & UAE
Jupiter Military & Tactical Systems
893, Doha Expy, Doha, Qatar
[+44 \(0\) 7917 401601](tel:+4407917401601)
info@jupiter-private.com
www.jupiter-private.com
<image002.jpg>

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On 15 Aug 2018, at 18:18, James Brickhouse <jbrickhouse11@gmail.com> wrote:

James,

As discussed, please forward the NDA asap, as well as a cost estimate on what work like this might entail.

Thank you,

Jim

Please call my cell anytime: [REDACTED]

EXCESSION LLC

NON-DISCLOSURE AGREEMENT FOR CONTRACTOR

This Agreement governs the disclosure of information by **EXCESSION LLC** and/or its affiliates (collectively, "**Excession**") to James Howard ("**Contractor**"), as of the date listed below (the "**Effective Date**").

1. **Confidentiality.** Contractor agrees that information that is not generally known to the public to which Contractor has been or will be exposed as a result of its being engaged by Excession is "**Confidential Information**" that belongs to Excession. Confidential Information includes, without limitation: (a) business, technical or financial information relating to business models, proprietary technologies, contracts, leases, operations, properties, patents, trademarks, trade secrets, designs, strategic initiatives, business plans, accounting, merchandising, sales, and/or marketing; (b) information about Excession's employees; and (c) information about Mr. Musk, his family, his friends, and/or his business associates; information about Mr. Musk business or personal interests, assets, or properties (including interests, assets, or properties held in trust for Mr. Musk); and business or technical information related to any of Mr. Musk's business or personal interests. Confidential Information also includes information developed by Contractor, alone or with others, or entrusted to Excession by others.
2. **Treatment and Use of Confidential Information.** Contractor will: (a) hold Excession's Confidential Information in strict confidence, and not disclose or use it except as authorized by Excession and for Excession's benefit; (b) use Excession's Confidential Information for no purpose other than to evaluate or pursue a potential business relationship with Excession; (c) ensure that Excession's Confidential Information is accessible only to those of its employees or authorized representatives who have a need to know and who have signed confidentiality agreements or are otherwise bound by confidentiality obligations at least as restrictive as those contained herein; (d) refrain from reproducing Excession's Confidential Information in any form except as required to accomplish the intent of this Agreement; and (e) refrain from participating in the preparation of any book, article, story, video or film, and from giving interviews about, Mr. Musk, his family, friends, business associates or business or personal interests. Any reproduction of any Excession Confidential Information shall remain the property of Excession and shall contain any and all confidential or proprietary notices or legends that appear on the original, unless otherwise authorized in writing by Excession. Failure to include such notices or legends will not alter or waive the status of the information as Excession's Confidential Information. Contractor's agreements to protect Excession's Confidential Information apply both while Contractor is engaged by Excession and after its engagement ends, regardless of the reason it ends.
3. **Exceptions.** Contractor understands that this Agreement does not limit Contractor's right to use its own general knowledge and experience, whether or not gained while engaged by Excession. Excession's Confidential Information does not include information that: (a) has entered the public domain through no fault of or breach by Contractor; (b) was in Contractor's possession free of any obligation of confidence at the time it was communicated to Contractor by Excession; (c) was rightfully communicated to Contractor free of any obligation of confidence subsequent to the time it was communicated to Contractor by Excession; (d) was developed by Contractor independently of and without reference to any information communicated to Contractor by Excession; or (e) Contractor must lawfully disclose in response to a valid order, statute, rule, or regulation of a governmental entity (provided that Contractor immediately notifies Excession of any such order, demand, or request, so that Excession may take any actions it deems necessary to protect its interests). Notwithstanding the foregoing, Contractor has the burden in any dispute of showing that information is not Excession's Confidential Information.
4. **Third Party Information.** Contractor understands it is Excession's policy not to improperly obtain or use confidential, proprietary, or trade secret information that belongs to third parties, including others who have employed or engaged Contractor or who have entrusted confidential information to Contractor. Contractor will not use for Excession's benefit, or disclose to Excession, confidential, proprietary, or trade secret information that belongs to

EXCESSION LLC.

NON-DISCLOSURE AGREEMENT FOR CONTRACTORS

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others, unless Contractor advises Excession that the information belongs to a third party and both Excession and the owners of the information consent to the disclosure and use.

5. **Inventions, Copyrights and Patents.** Excession owns all Inventions and Works (see definition below) Contractor makes, conceives, develops, discovers, reduces to practice or fixes in a tangible medium of expression, alone or with others, either: (a) during Contractor's engagement with Excession (including past engagements, and whether or not during working hours); or (b) if the Invention or Work results from any work Contractor performed for Excession or involves the use or assistance of Excession's facilities, materials, personnel or Confidential Information. Excession also owns all Inventions and Works of Contractor that it brings to Excession that are used in the course of Excession's business or that are incorporated into any Inventions or Works that belong to Excession.

Contractor will promptly disclose to Excession, will hold in trust for Excession's sole benefit, will assign to Excession and hereby does assign to Excession all Inventions and Works described in the prior paragraph, including all copyrights (including renewal rights), patent rights and trade secret rights, vested and contingent. Contractor will waive and hereby does waive any moral rights it has or may have in the Inventions and Works described in the prior paragraph. Contractor agrees that all Works it produces within the scope of its engagement (which shall include all Works Contractor produces related to Excession's business, whether or not done during regular working hours) shall be considered "Works made for hire" so that Excession will be considered the author of the Works under the federal copyright laws. At Excession's direction and expense Contractor will execute all documents and take all actions necessary or convenient for Excession to document, obtain, maintain or assign its rights to these Inventions and Works. Excession shall have full control over all applications for patents or other legal protection of these Inventions and Works. Nothing contained in this Agreement shall be construed as granting any proprietary rights, by license or otherwise, to any of Excession's Confidential Information, or to any invention, patent, copyright, trademark, or other intellectual property right that has issued or may issue, based on such Confidential Information.

"Inventions" means discoveries, developments, concepts, ideas, improvements to existing technology, processes, procedures, machines, products, compositions of matter, formulas, algorithms, computer programs and techniques, and all other matters ordinarily intended by the word "Invention", whether or not patentable or copyrightable. "Inventions" also includes all records and expressions of those matters. "Works" means original works of authorship, including interim work product, modifications and derivative works, and all similar matters, whether or not copyrightable.

Contractor understands that this Agreement does not apply to any Invention or Work of Contractor for which no equipment, supplies, facilities or trade secret information of Excession was used and which was developed entirely on Contractor's own time, unless (a) the Invention or Work relates directly to Excession's business or actual or demonstrably anticipated research or development, or (b) the Invention or Work results from any work Contractor performed for Excession.

6. **Return of Excession Materials.** Contractor will safeguard and return to Excession when its engagement ends, or sooner if Excession requests, all documents and property in its care, custody, or control relating to its engagement or Excession's business, including without limitation any documents that contain Excession's Confidential Information. Contractor shall immediately notify Excession upon discovery of any loss or unauthorized disclosure of Excession's Confidential Information.
7. **Non-raiding of Employees.** So long as Contractor is engaged by Excession and for twenty-four (24) months after its engagement ends, regardless of the reason it ends, Contractor will not directly or indirectly solicit any employee to leave his or her employment with Excession. This includes that Contractor will not: (a) disclose to any third party the names, backgrounds, or qualifications of any Excession employees or otherwise identify them as potential candidates for employment; (b) personally or through any other person approach, recruit, or otherwise solicit employees of Excession to work for any other employer; or (c) participate in

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EXCESSION LLC.

NON-DISCLOSURE AGREEMENT FOR CONTRACTORS

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any pre-employment interviews with any person who was employed by Excession while Contractor was engaged by Excession .

8. **No Disparagement or Interference.** Contractor will not disparage Excession or its business or products and will not interfere with Excession 's relationships with its customers, employees, vendors, bankers, or others. Contractor will not disparage Mr. Musk, his family, friends, business associates, or business or personal interests. These agreements apply both while Contractor is engaged by Excession and after its engagement with Excession ends, regardless of the reason it ends.
9. **Other Employment While Engaged By Excession.** While Contractor is engaged by Excession Contractor will not do work that competes with or relates to any of Excession 's activities without first obtaining Excession 's written permission. Any business opportunities related to Excession 's business, that Contractor learns of or obtains while engaged by Excession (whether or not during working hours), belong to Excession, and Contractor will pursue them only for Excession 's benefit.
10. **Disclosure of Other Work.** Before Contractor undertakes any work for itself or anyone else during its engagement with Excession that will involve subject matter related to Excession 's activities, Contractor will fully disclose the proposed work to Excession.
11. **Future Consulting or Employment for Excession.** If Contractor's contract relationship with Excession ends but Excession engages Contractor as a consultant again or employs Contractor, then this Agreement shall apply to Contractor's later employment(s) or engagement(s) unless they follow a period of a year or more during which Contractor was neither employed nor engaged by Excession. If this Agreement becomes applicable to a consulting relationship, the references in this Agreement to Contractor's employment by Excession shall be treated, as appropriate, as referring to Contractor's consulting relationship with Excession.
12. **No Conflicting Agreements.** Contractor is not a party to any agreements, such as confidentiality or non-competition agreements, which limit its right to enter into this Agreement or its ability to perform its duties for Excession.
13. **No Warranties.** All Excession Confidential Information is provided "as is". Excession makes no warranties, express, implied, or otherwise, regarding the accuracy, completeness, or utility of such Confidential Information.
14. **No Other Obligations.** Nothing in this Agreement shall obligate Excession to enter into any further agreement or negotiation with Contractor or to refrain from entering into an agreement or negotiation with any third party.
15. **Term and Termination.** This Agreement shall terminate three (3) years after the Effective Date, or may be terminated by either party at any time upon thirty (30) days written notice to the other party. The Contractor's obligations under this Agreement shall survive termination of this Agreement.
16. **Violation of Agreement, Costs and Attorney Fees, Governing Law, Venue and Jurisdiction, Enforceability and Waiver.** If Contractor breaches this Agreement it will cause Excession irreparable harm. If Contractor breaches or threatens to breach this Agreement, Excession will be entitled to injunctive or other equitable relief as well as money damages. If Contractor breaches this Agreement, Contractor will hold in trust for Excession all income it receives as a result of the violation. Contractor consents to Excession notifying anyone to whom Contractor may provide services of the existence and terms of this Agreement. In any dispute arising out of or relating to this Agreement or Contractor's

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EXCESSION LLC.

NON-DISCLOSURE AGREEMENT FOR CONTRACTORS

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engagement, including without limitation arising from any alleged tort or statutory violation, the prevailing party shall recover their reasonable costs and attorney's fees, including on appeal. This Agreement shall be governed by the internal laws of the State of Washington without giving effect to provisions thereof related to choice of laws or conflict of laws. Venue and jurisdiction of any lawsuit involving this Agreement or Contractor's engagement shall exist exclusively in state and federal courts in King County, Washington, unless injunctive relief is sought by Excession and, in Excession's judgment, may not be effective unless obtained in some other venue. If any part of this Agreement is held to be unenforceable, it shall not affect any other part. If any part of this Agreement is held to be unenforceable as written, it shall be enforced to the maximum extent allowed by applicable law. Contractor's obligations under this Agreement supplement and do not limit other obligations Contractor has to Excession, including without limitation under the law of trade secrets. This Agreement shall be enforceable regardless of any claim Contractor may have against Excession. This Agreement shall survive the termination of Contractor's engagement, however caused. The waiver of any breach of this Agreement or failure to enforce any provision of this Agreement shall not waive any later breach. This Agreement is binding on Contractor, its heirs, executors, personal representatives, successors and assigns, and benefits Excession and its successors and assigns. This Agreement is the final and complete expression of Contractor's agreement on these subjects, and may be amended only in writing.

DATED this 15th day of August 2018.

EXCESSION LLC.

By: 

Name: Jared Birchall

Title: Manager

Address:

PO Box 49258
Los Angeles, CA 90049

By:



Name: James Howard

Title: Chief Executive

Address: Jupiter Military & Tactical Systems

Al Saad – Area 38
Street No. 893
Building No. 7
P.O. Box 22509
Doha,
State of Qatar

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Exhibit 28

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